OF OREGON

UE 180

| In the Matters of | |) | |
|--|----------|---|--|
| PORTLAND GENERAL ELECTRIC COMPANY | |) | |
| Request for a General Rate Revision | (UE 180) |) | MOTION OF CITY OF PORTLAND, CITY OF |
| Annual Adjustments to Schedule 125 (2007 RVM Filing). | (UE 181) |) | GRESHAM AND LEAGUE OF OREGON CITIES TO ADMIT |
| Request for a General Rate Revision r the Port Westward Plant. | , |) | TESTIMONY |

The City of Portland, City of Gresham and the League of Oregon Cities (collectively, the "Cities") hereby move to admit into the record of the above captioned consolidated proceedings the following jointly sponsored and previously filed testimony and exhibits:

- Direct Testimony and Exhibits of Richard Gray, John Harris, Andrea Fogue, John Heberling and Lon L. Peters (COP/COG/LOC/200-219);
- Surrebuttal Testimony and Exhibits of Richard Gray, John Harris, Andrea Fogue, John Heberling and Lon L. Peters (COP/COG/LOC/250-264B).
- Witness Qualification Statement of Andra Fogue (LOC/100)
- Witness Qualification Statement of John Heberling (LOC/101)

Attached as Exhibit A are witness affidavits from Richard Gray, John Harris, Andrea Fogue, John Heberling and Lon L. Peters supporting this motion and the above-referenced prefiled testimony and exhibits.

DATED this ______ day of November, 2006.

Respectfully submitted,

Benjamin Walters, OSB #85354 Senior Deputy City Attorney Of Attorneys for City of Portland

Jim Deason, OSB #95497
Attorney at Law
1 SW Columbia Street, Suite 1600
Portland, OR 97252

Of Attorneys for the League of Oregon Cities

David Ris, OSB #83358 Gresham City Attorney's Office 1333 NW Eastman Pkwy.

Gresham, OR 97030

Of Attorneys for City of Gresham

OF OREGON

| In the | e Matter of | · |
|--------|---|--|
| | TLAND GENERAL ELECTRIC PANY | A DESIDA NATIONAL ON L. DOUBLING |
| Requ | est for a General Rate Revision (UE 180), | AFFIDAVIT OF LON L. PETERS |
| | al Adjustments to Schedule 125 (RVM Filing) (UE 181), | |
| - | est for a General Rate Revision relating to ort Westward Plant (UE 184). | |
| | TE OF OREGON)) ss | |
| Coun | ty of Multnomah) | |
| | I, Lon L. Peters, being first duly sworn on | oath, depose and say as follows: |
| 1. | | tent of Northwest Economic Research, Inc. I ess for the City of Portland, Oregon; the City regon Cities. |
| 2. | Together with Richard Gray and John Hard proceeding as COP/COG/100-101 on behaving the League of Oregon Cities. | ris I co-sponsored testimony filed in this lf of the City of Portland, the City of Gresham |
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3. My testimony and exhibits that were previously filed are true and accurate. To the best of my knowledge, there are no corrections necessary. If I were asked the same questions today, my answers would be the same.

Lon L. Peters

SUBSCRIBED AND SWORN TO before me this day of Nove

OTARY PUBLIC FOR OREGON

My Commission Expires:

OFFICIAL SEAL
JOEL H FIELDS
NOTARY PUBLIC-OREGON
COMMISSION NO. 380479
NY COMMISSION EXPIRES MAY 6, 2008

OF OREGON

| In the | Matter of | |
|--------|---|--------------------------------|
| | LAND GENERAL ELECTRIC PANY | AFFIDAVIT OF JOHN HARRIS |
| Reque | est for a General Rate Revision (UE 180), | AFFIDAVII OF JOHN HARRIS |
| | al Adjustments to Schedule 125 RVM Filing) (UE 181), | |
| _ | est for a General Rate Revision relating to ert Westward Plant (UE 184). | |
| STAT | E OF OREGON) | |
| Count | y of Multnomah) | |
| | I, John Harris, being first duly sworn on oa | th, depose and say as follows: |
| 1. | My name is John Harris. I am employed a Superintendent for the City of Gresham, O Services. I have appeared in this proceeding and the City of Gresham, Oregon. | |
| 2. | Together with Richard Gray and Lon L. Peproceeding as COP/COG/100-101 on beha Gresham. | |
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3. My testimony and exhibits that were previously filed are true and accurate. To the best of my knowledge, there are no corrections necessary. If I were asked the same questions today, my answers would be the same.

SUBSCRIBED AND SWORN TO before me this 1st day of November, 2006.

NOTARY PUBLIC FOR OREGON

My Commission Expires: 10/4/07

OF OREGON

UE 180/ UE 181/ UE 184

| In the | Matter of | |
|--------|---|--|
| | LAND GENERAL ELECTRIC PANY | |
| Reque | est for a General Rate Revision (UE 180), | AFFIDAVIT OF RICHARD GRAY |
| | al Adjustments to Schedule 125 RVM Filing) (UE 181), | |
| | est for a General Rate Revision relating to rt Westward Plant (UE 184). | MYC |
| STAT | E OF OREGON) | |
| Count | y of Multnomah) | |
| | I, Richard Gray, being first duly sworn on | oath, depose and say as follows: |
| 1. | My name is Richard Gray. I am currently of Transportation as a Senior Management appeared in this proceeding as a witness for | employed by the City of Portland in the Office Analyst and Contract Administrator. I have or the City of Portland, Oregon. |
| 2. | Together with John Harris and Lon L. Peter proceeding as COP/COG/100-101 on beha | ers, I co-sponsored testimony filed in this alf of the City of Portland. |
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3. My testimony and exhibits that were previously filed are true and accurate. To the best of my knowledge, there are no corrections necessary. If I were asked the same questions today, my answers would be the same.

OFFICIAL SEAL

DEE A. WALKER NOTARY PUBLIC-OREGON COMMISSION NO. 388424 MY COMMISSION EXPIRES JANUARY 11, 2009 Richard Gray, Sr. Mgmt Analyst &

Contract Administrator City of Portland, Oregon

SUBSCRIBED AND SWORN TO before me this

day of November, 2006.

NOTARY PUBLIC FOR OREGON My Commission Expires: 1-11-2009



OF OREGON

| In the | Matter of | |
|--------|--|--|
| | TLAND GENERAL ELECTRIC PANY | A EPID A VIIT OF DIGHADD CDAY |
| Reque | est for a General Rate Revision (UE 180), | AFFIDAVIT OF RICHARD GRAY |
| | al Adjustments to Schedule 125 (RVM Filing) (UE 181), | |
| - | est for a General Rate Revision relating to ort Westward Plant (UE 184). | |
| STAT | TE OF OREGON)) ss | |
| Count | ty of Multnomah) | |
| | I, Richard Gray, being first duly sworn on | oath, depose and say as follows: |
| 1. | | employed by the City of Portland in the Office Analyst and Contract Administrator. I have or the City of Portland, Oregon. |
| 2. | Together with John Harris, Andrea Fogue, sponsored testimony and exhibits filed in tand COP/COG/LOC/250-264B on behalf | his proceeding as COP/COG/LOC 200-219 |
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3. My testimony and exhibits that were previously filed are true and accurate. To the best of my knowledge, there are no corrections necessary. If I were asked the same questions

today, my answers would be the same.

Richard Gray, Sr. Mgmt Analyst & Contract Administrator City of Portland, Oregon

SUBSCRIBED AND SWORN TO before me this _ day of November, 2006.

OFFICIAL SEAL DEE A. WALKER NOTARY PUBLIC-OREGON COMMISSION NO. 388424 MY COMMISSION EXPIRES JANUARY 11, 2009 NOTARY PUBLIC FOR OREGON My Commission Expires: 1-11-2009

OF OREGON

| In the | Matter of | | |
|--------|--|---|--|
| | TLAND GENERAL ELECTRIC PANY | A FEYD A YAT OF JOHN HADDIG | |
| Reque | est for a General Rate Revision (UE 180), | AFFIDAVIT OF JOHN HARRIS | |
| | al Adjustments to Schedule 125 RVM Filing) (UE 181), | | |
| _ | est for a General Rate Revision relating to ort Westward Plant (UE 184). | | |
| | STATE OF OREGON)) ss County of Multnomah) | | |
| | I, John Harris, being first duly sworn on oa | ath, depose and say as follows: | |
| 1. | My name is John Harris. I am employed a Superintendent for the City of Gresham, O Services. I have appeared in this proceedit Oregon; the City of Gresham, Oregon; and | regon in the Department of Environmental ng as a witness for the City of Portland, | |
| 2. | sponsored testimony and exhibits filed in t | e, John Herberling and Lon L. Peters, I cohis proceeding as COP/COG/LOC/200-219 of the City of Portland, the City of Gresham, | |
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3. My testimony and exhibits that were previously filed are true and accurate. To the best of my knowledge, there are no corrections necessary. If I were asked the same questions

today, my answers would be the same.

John Harris

SUBSCRIBED AND SWORN TO before me this / day of November, 2006.

NOTARY PUBLIC FOR OREGON

My Commission Expires: 10/4/07

| 1 | BEFORE THE PUBLIC UTILITY COMMISSION | |
|-------------------------|---|--|
| 2 | OF OREGON | |
| 4 5 | UE 180 | |
| 6 | In the Matters of) | |
| | PORTLAND GENERAL ELECTRIC COMPANY) | |
| | Request for a General Rate Revision (UE 180) AFFIDAVIT OF ANDREA FOGUE | |
| | Annual Adjustments to Schedule 125 (2007 RVM Filing). (UE 181) | |
| | Request for a General Rate Revision relating to the Port Westward Plant. (UE 184) | |
| 7 8 9 10 11 | State of Oregon)) ss. County of Marion) | |
| 12 | I, Andrea Fogue, being first duly sworn on oath, depose and say as follows: | |
| 13 | 1. My name is Andrea Fogue. I am employed by the League of Oregon Cities | |
| 14 | ("LOC") as a Senior Staff Associate. I am appearing in this proceeding as a witness for the | |
| 15 | LOC. My business address is: 1201 Court Street NE, Suite 200, Salem, Oregon 97301. | |
| 16 | 2. In connection with the above-captioned proceeding and acting on behalf of the | |
| 17 | LOC, I sponsored joint testimony along with Richard Gray, John S. Harris, John Heberling and | |
| 18 | Lon L. Peters. Our joint testimony was pre-filed and marked as follows: | |
| 19 20 | Direct Testimony and Exhibits of Richard Gray, John Harris, Andrea Fogue, John Heberling and Lon L. Peters (COP/COG/LOC/200-219); | |
| 21 22 23 | Surrebuttal Testimony and Exhibits of Richard Gray, John Harris, Andrea Fogue, John Heberling and Lon L. Peters (COP/COG/LOC/250-264B). | |

| 1 | My witness qualification statement was also pre-filed and marked as LOC/100. |
|----------------|---|
| 2 | 3. My pre-filed testimony and exhibits are true and accurate. To the best of my |
| 3 | knowledge there are no corrections necessary. If I were asked the same questions today, my |
| 4 | answers would be the same. |
| 5 | |
| 6 7 | Andrea Fogue Andrea Fogue |
| 8 9 | SUBSCRIBED AND SWORN TO before me this 3 day of October, 2006. |
| 10 11 12 | OFFICIAL SEAL HEATHER R WILDE NOTARY PUBLIC-OREGON COMMISSION NO. 395556 MY COMMISSION EXPIRES AUGUST 1, 2000 OTARY PUBLIC FOR OREGON |
| 13 14 | My Commission Expires: AUGUST 1, 2019 |
| 15 16 17 | OFFICIAL SEAL HEATHER R WILDE NOTARY PUBLIC-OREGON COMMISSION NO. 395556 |
| 18 | MY COMMISSION EXPIRES AUGUST 1, 2009 |

| 1 | BEFORE THE PUBLIC UTILITY COMMISSION | |
|-------------------------|---|--|
| 2 | OF OREGON | |
| 4 5 6 | UE 180 | |
| U | In the Matters of) | |
| | PORTLAND GENERAL ELECTRIC COMPANY) | |
| | Request for a General Rate Revision (UE 180)) AFFIDAVIT OF | |
| | Annual Adjustments to Schedule 125 (2007 RVM Filing). (UE 181)) JOHN L. HEBERLING) | |
| | Request for a General Rate Revision relating to the Port Westward Plant. (UE 184) | |
| 7 8 9 10 11 | State of Washington) County of Snohomish) ss. | |
| 12 | I, John L. Heberling, being first duly sworn on oath, depose and say as follows: | |
| 13 | 1. My name is John L. Heberling. I am a Vice President at D. Hittle & Associates, | |
| 14 | Inc. My business address is 19101 36 th Avenue West, Suite 209, Lynnwood, Washington 98036. | |
| 15 | 2. In connection with the above-captioned proceeding and acting on behalf of the | |
| 16 | League of Oregon Cities ("LOC"), I sponsored joint testimony along with Richard Gray, John S. | |
| 17 | Harris, Andrea Fogue and Lon L. Peters. Our joint testimony was pre-filed and marked as | |
| 18 | follows: | |
| 19 20 | Direct Testimony and Exhibits of Richard Gray, John Harris, Andrea Fogue, John Heberling and Lon L. Peters (COP/COG/LOC/200-219); | |
| 21 22 23 | Surrebuttal Testimony and Exhibits of Richard Gray, John Harris, Andrea Fogue, John Heberling and Lon L. Peters (COP/COG/LOC/250-264B). | |

My witness qualification statement was also pre-filed and marked as LOC/101. 1 My pre-filed testimony and exhibits are true and accurate. To the best of my 2 3. knowledge there are no corrections necessary. If I were asked the same questions today, my 3 4 answers would be the same. 5 6 7 8 3/ST day of October, 2006. SUBSCRIBED AND SWORN TO before me this 9 10 11 NOT TRY PUBLIC FOR WASHINGT 12 13 My Commission Expires: 5 14 15 16 17

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OF OREGON

| In the | Matter of | |
|--------|--|---|
| | LAND GENERAL ELECTRIC PANY | A EEUD A WITE OF LON L. DEITEDG |
| Reque | est for a General Rate Revision (UE 180), | AFFIDAVIT OF LON L. PETERS |
| | al Adjustments to Schedule 125 RVM Filing) (UE 181), | |
| _ | est for a General Rate Revision relating to ort Westward Plant (UE 184). | |
| STAT | E OF OREGON) | |
| Count | y of Multnomah) | |
| | I, Lon L. Peters, being first duly sworn on | oath, depose and say as follows: |
| 1. | • | lent of Northwest Economic Research, Inc. I ess for the City of Portland, Oregon; the City regon Cities. |
| 2. | | Andrea Fogue and John Herberling, I cohis proceeding as COP/COG/LOC/200-219 of the City of Portland, the City of Gresham, |
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3. My testimony and exhibits that were previously filed are true and accurate. To the best of my knowledge, there are no corrections necessary. If I were asked the same questions today, my answers would be the same.

Lon L. Peters

SUBSCRIBED AND SWORN TO before me this day of day of Novania, 2006.

NOTARY PUBLIC FOR OREGON My commission Expires: My b 2008

OFFICIAL SEAL JOEL H FIELDS
NOTARY PUBLIC-OREGON COMMISSION NO. 380479
MY COMMISSION EXPIRES MAY 6, 2008

| 1 | CERTIFICATE OF SERVICE |
|----|--|
| 2 | |
| 3 | I hereby certify that I served a copy of the foregoing CITY OF PORTLAND, CITY OF |
| 4 | GRESHAM & LEAGUE OF OREGON CITIES' MOTION TO ADMIT TESTIMONY and |
| 5 | AFFIDAVITS OF RICHARD GRAY, JOHN HARRIS, ANDREA FOGUE, JOHN |
| 6 | HEBERLING AND LON L. PETERS on the individuals on the attached Service List by |
| 7 | electronic mail on this day of November, 2006. |
| 8 | |
| 9 | \mathcal{L} |
| 10 | Berjamin Walters |
| 11 | Benjamin Walters, OSB #85354 |
| 12 | Senior Deputy City Attorney |
| 13 | Of Attorneys for City of Portland |
| 14 | |

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SUPERINTENDENT

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