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August 16, 2012

*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 PORTLAND GENERAL ELECTRIC COMPANY  
Request for a General Rate Revision  
**Docket No. UE 250**

Dear Filing Center:

Enclosed for filing please find an original and one (1) copy of a Motion to Admit Pre-filed Testimony (with Affidavit) on behalf of the Industrial Customers of Northwest Utilities in the above-referenced docket, with the certificate of proof of service attached.

Please contact our office if you have any questions. Thank you for your assistance.

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 Motion to Admit Pre-filed Testimony (with Affidavit) on behalf of the Industrial Customers of Northwest Utilities in Docket No. UE 250 upon the parties, on the service list, by causing the same to be deposited in the U.S. Mail, postage-prepaid, and via electronic mail where paper service has been waived.

Dated at Portland, Oregon, this 16th day of August, 2012.

/s/ Sarah A. Kohler  
Sarah A. Kohler

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**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**UE 250**

In the Matter of	)	
	)	
PORTLAND GENERAL ELECTRIC CO.	)	
	)	
2013 Annual Update Tariff	)	INDUSTRIAL CUSTOMERS OF
(UE 250)	)	NORTHWEST UTILITIES MOTION TO
and	)	ADMIT PREFILED TESTIMONY (WITH
	)	AFFIDAVIT)
Annual Power Cost Update;	)	
Advice No. 12-08, Schedules 125 and 126 to	)	
include chemical costs associated with the	)	
Boardman plant’s pollution control	)	
<u>requirements.</u>	)	
(UE 251)	)	

Pursuant to the Administrative Law Judge’s Ruling, dated August 14, 2012, the Industrial Customers of Northwest Utilities (“ICNU”) hereby moves that the following pre-filed testimony and exhibit submitted on behalf of ICNU be admitted to the record.

Testimony & Exhibit	Witness
ICNU/100-101	Michael C. Deen

The original affidavit of Michael C. Deen attesting to the truth and accuracy of the testimony and exhibit is attached.

Dated this 16th day of August, 2012.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Irion A. Sanger

S. Bradley Van Cleve

Irion A. Sanger

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Of Attorneys for Industrial Customers  
of Northwest Utilities

**BEFORE THE PUBLIC UTILITY COMMISSION**

**OF OREGON**

**UE 250**

In the Matter of )  
 )  
PORTLAND GENERAL ELECTRIC )  
 )  
2013 Annual Update Tariff )  
 )  
and (UE 250) )  
 )  
Annual Power Cost Update; )  
Advice No. 12-08, Schedules 125 and 126 to )  
include chemical costs associated with the )  
Boardman plant's pollution control )  
requirements. (UE 251) )

AFFIDAVIT OF MICHAEL C. DEEN

I, Michael C. Deen, being first duly sworn on oath, depose and say:

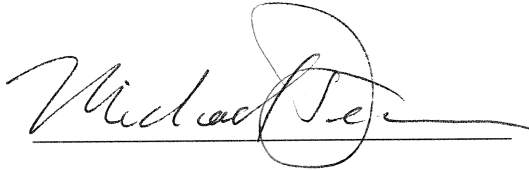
1. My name is Michael C. Deen. Regulatory and Cogeneration Services, Inc. ("RCS"). RCS is a utility rate and consulting firm. I am appearing in this proceeding as a witness for the Industrial Customers of Northwest Utilities ("ICNU"). My business address is 900 Washington Street, Suite 780, Vancouver, WA 98660.

2. I sponsored pre-filed testimony and an exhibit on behalf of ICNU in Oregon Public Utility Commission Docket No. UE 250. Specifically, Opening Testimony (ICNU/100) and exhibit, ICNU/101, were filed on July 6, 2012.

3. My testimony and exhibit that were previously filed are true and accurate, and no corrections need to be made. If I were asked the same questions today, my answers would be the same.

I HEREBY DECLARE THAT THE ABOVE STATEMENT IS TRUE TO THE BEST OF MY KNOWLEDGE AND BELIEF, AND THAT I UNDERSTAND IT IS MADE FOR USE AS EVIDENCE AND IS SUBJECT TO PENALTY FOR PERJURY.

SIGNED THIS 15th day of August, 2012, at Portland, Oregon.



Michael C. Deen

SUBSCRIBED AND SWORN to before me this 15th day of August, 2012.



NOTARY PUBLIC FOR OREGON

My Commission Expires: March 10, 2015