

October 12, 2004

VIA REGULAR MAIL

ANNETTE TAYLOR
OREGON PUBLIC UTILITY COMMISSION
PO BOX 2148
SALEM OR 97308-2148

Re: In the Matter of Oregon Electric Utility Company, LLC, et al.,
Application for Authorization to Acquire Portland General Electric Company
Docket No. UM 1121

Dear Ms. Taylor:

Enclosed are an original and five (5) copies of the Cross-Examination Statement of the City of Portland, Oregon in this proceeding.

Thank you for your assistance.

Very truly yours,

/s/ Benjamin Walters
Benjamin Walters
Senior Deputy City Attorney

BEW:pd
Enclosures

c: UM 1121 Service List

Oregon Public Utility Commission
October 12, 2004
Page 2

bc: Kathleen Gardipee
Susan Anderson
Michael Armstrong
Linda Meng

1 **BEFORE THE PUBLIC UTILITY COMMISSION**
2 **OF OREGON**
3 **UM 1121**

4 In the Matter of
5 OREGON ELECTRIC UTILITY
6 COMPANY, LLC, et al
7 Application for Authorization to Acquire
8 Portland General Electric Company

CROSS-EXAMINATION STATEMENT
OF CITY OF PORTLAND, OREGON

9 The City of Portland does not intend to conduct cross-examination of any of the
10 witnesses scheduled for the hearing on October 19-21, 2004. The City of Portland plans to
11 attend the hearing, but will rely on the evidentiary record developed by the other parties.

12 The City of Portland reserves the right to conduct cross-examination based on
13 developments that occur before or during the hearing.

14 Dated this 12th day of October, 2004.

15 Respectfully submitted,

16
17 /s/ Benjamin Walters
18 Benjamin Walters, OSB #85354
19 Senior Deputy City Attorney
20 Of Attorneys for City of Portland
21
22
23
24
25
26

1 CERTIFICATE OF SERVICE

2 I hereby certify that on October 12, 2004, I mailed an original and five copies of the
3 foregoing CROSS-EXAMINATION STATEMENT OF CITY OF PORTLAND, OREGON to:

4 PUBLIC UTILITY COMMISSION OF OREGON
5 ATTN: ANNETTE TAYLOR
6 550 CAPITOL ST., NE., SUITE 215
PO BOX 2148
SALEM, OR 97308-2148

7 and on October 12, 2004, I hereby certify that the foregoing document was electronically mailed
8 to all Persons on the Service List maintained by the Public Utility Commission for the UM 1121
9 proceeding who had an e-mail address posted. I further certify that for those persons on the
10 Service List who were not identified as having an e-mail address, a copy was sent by first class
11 mail, contained in a sealed envelope, with postage paid, and deposited in the post office at
12 Portland, Oregon on said day.

13 /s/ Benjamin Walters

14 _____
15 Benjamin Walters, OSB #85354
16 Senior Deputy City Attorney
Of Attorneys for City of Portland
17
18
19
20
21
22
23
24
25
26

SERVICE LIST

<p>JIM ABRAHAMSON -- CONFIDENTIAL COMMUNITY ACTION DIRECTORS OF OREGON 4035 12TH ST CUTOFF SE STE 110 SALEM OR 97302 jim@cado-oregon.org</p>	<p>SUSAN K ACKERMAN NIPPC PO BOX 10207 PORTLAND OR 97296-0207 susan.k.ackerman@comcast.net</p>
<p>GRIEG ANDERSON 5919 W MILES ST. PORTLAND OR 97219</p>	<p>JEANNE L ARANA OREGON HOUSING AND COMMUNITY SERVICES DEPT PO BOX 14508 SALEM OR 97301 jeanne.arana@hcs.state.or.us</p>
<p>KEN BEESON -- CONFIDENTIAL EUGENE WATER & ELECTRIC BOARD 500 EAST FOURTH AVENUE EUGENE OR 97440-2148 ken.beeson@eweb.eugene.or.us</p>	<p>JULIE BRANDIS -- CONFIDENTIAL ASSOCIATED OREGON INDUSTRIES 1149 COURT ST NE SALEM OR 97301-4030 jbrandis@aoi.org</p>
<p>KIM BURT WEST LINN PAPER COMPANY 4800 MILL ST WEST LINN OR 97068 kburt@wlinpco.com</p>	<p>J LAURENCE CABLE -- CONFIDENTIAL CABLE HUSTON BENEDICT ET AL 1001 SW 5TH AVE STE 2000 PORTLAND OR 97204-1136 lcable@chbh.com</p>
<p>D. KEVIN CARLSON DEPT OF JUSTICE - GENERAL COUNSEL DIVISION 1162 COURT ST NE SALEM OR 97301-4096 d.carlson@doj.state.or.us</p>	<p>MICHAEL CARUSO 176 SW HEMLOCK DUNDEE OR 97115 carusodad@hotmail.com</p>
<p>JENNIFER CHAMBERLIN -- CONFIDENTIAL STRATEGIC ENERGY LLC 2633 WELLINGTON COURT CLYDE CA 94520 jchamberlin@sel.com</p>	<p>WILLIAM H CHEN CONSTELLATION NEWENERGY INC 2175 N CALIFORNIA BLVD STE 300 WALNUT CREEK CA 94596 bill.chen@constellation.com</p>
<p>JOAN COTE -- CONFIDENTIAL OREGON ENERGY COORDINATORS ASSOCIATION 2585 STATE ST NE SALEM OR 97301 cotej@mwwcaa.org</p>	<p>CHRIS CREAN -- CONFIDENTIAL MULTNOMAH COUNTY 501 SE HAWTHORNE, SUITE 500 PORTLAND OR 97214 christopher.d.crean@co.multnomah.or.us</p>
<p>MELINDA J DAVISON -- CONFIDENTIAL DAVISON VAN CLEVE PC</p>	<p>JIM DEASON CABLE HUSTON BENEDICT HAAGENSEN &</p>

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26

1000 SW BROADWAY STE 2460 PORTLAND OR 97205 mail@dvclaw.com	LLOYD LLP 1001 SW FIFTH AVE STE 2000 PORTLAND OR 97204-1136 jdeason@chbh.com
JAMES DITTMER -- CONFIDENTIAL UTILITECH INC 740 NW BLUE PKWY STE 204 LEE'S SUMMIT MO 64086 jdittmer@utilitech.net	J JEFFREY DUDLEY -- CONFIDENTIAL PORTLAND GENERAL ELECTRIC 121 SW SALMON ST 1WTC1301 PORTLAND OR 97204 jay.dudley@pgn.com
GARY DUELL -- CONFIDENTIAL 11301 SE CHARVIEW COURT CLACKAMAS, OR OR 97015 gduell@bigplanet.com	JASON EISDORFER -- CONFIDENTIAL CITIZENS' UTILITY BOARD OF OREGON 610 SW BROADWAY STE 308 PORTLAND OR 97205 jason@oregoncub.org
JAMES F FELL -- CONFIDENTIAL STOEL RIVES LLP 900 SW 5TH AVE STE 2600 PORTLAND OR 97204-1268 jffell@stoel.com	ANN L FISHER -- CONFIDENTIAL AF LEGAL & CONSULTING SERVICES 1425 SW 20TH STE 202 PORTLAND OR 97201 energlaw@aol.com
ANDREA FOGUE LEAGUE OF OREGON CITIES PO BOX 928 1201 COURT ST NE STE 200 SALEM OR 97308 afogue@orcities.org	SCOTT FORRESTER FRIENDS OF THE CLACKAMAS RIVER 2030 NW 7TH PL GRESHAM OR 97030 clackamas9@aol.com
KATHERINE FUTORNICK 14800 NE BLUEBIRD HILL LANE DAYTON OR 97114 futork@onlinemac.com	LORA GARLAND L-7 BONNEVILLE POWER ADMINISTRATION P.O. BOX 3621 PORTLAND OR 97208-3621 lmgarland@bpa.gov
LEONARD GIRARD 2169 SW KINGS COURT PORTLAND OR 97205 lgirard@teleport.com	ANN ENGLISH GRAVATT -- CONFIDENTIAL RENEWABLE NORTHWEST PROJECT 917 SW OAK - STE 303 PORTLAND OR 97205 ann@rnp.org
PATRICK G HAGER -- CONFIDENTIAL PORTLAND GENERAL ELECTRIC 121 SW SALMON ST 1WTC0702 PORTLAND OR 97204 patrick.hager@pgn.com	ROY HENDERSON PENSION ENHANCEMENT COMMITTEE 895 NW DALE AVENUE PORTLAND OR 97229 royhensn@msn.com
MARY ANN HUTTON -- CONFIDENTIAL CANON AND HUTTON	JOE JANSSENS PGE PENSION ENHANCEMENT

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26

SOUTHERN OREGON OFFICE 1141 NW KRING ST ROSEBURG OR 97470 mah@canonandhutton.com	COMMITTEE 24495 BUTTEVILLE RD NE AURORA OR 97002 osprey64@juno.com
VALARIE KOSS COLUMBIA RIVER PUD PO BOX 1193 SAINT HELENS OR 97051 vkoss@crpud.org	GEOFFREY M KRONICK LC7 -- CONFIDENTIAL BONNEVILLE POWER ADMINISTRATION PO BOX 3621 PORTLAND OR 97208-3621 gmkronick@bpa.gov
MICHAEL L KURTZ BOEHM, KURTZ & LOWRY 36 E 7TH ST STE 2110 CINCINNATI OH 45202 mkurtzlaw@aol.com	ROCHELLE LESSNER -- CONFIDENTIAL LANE, POWELL, SPEARS, LUBERSKY LLP 601 SW 2ND AVE. STE. 2100 PORTLAND OR 97204 lessnerr@lanepowell.com
KEN LEWIS -- CONFIDENTIAL 2880 NW ARIEL TERRACE PORTLAND OR 97210 kl04@mailstation.com	STEVEN G LINS GLENDALE, CITY OF 613 E BROADWAY STE 220 GLENDALE CA 91206-4394 slins@ci.glendale.ca.us
JAMES MANION -- CONFIDENTIAL WARM SPRINGS POWER ENTERPRISES PO BOX 960 WARM SPRINGS OR 97761 j_manion@wspower.com	LLOYD K MARBET DON'T WASTE OREGON 19142 S BAKERS FERRY RD BORING OR 97009 marbet@mail.com
GORDON MCDONALD PACIFIC POWER & LIGHT 825 NE MULTNOMAH STE 800 PORTLAND OR 97232 gordon.mcdonald@pacificcorp.com	DANIEL W MEEK -- CONFIDENTIAL DANIEL W MEEK ATTORNEY AT LAW 10949 SW 4TH AVE PORTLAND OR 97219 dan@meek.net
THAD MILLER -- CONFIDENTIAL OREGON ELECTRIC UTILITY COMPANY 222 SW COLUMBIA STREET, SUITE 1850 PORTLAND OR 97201-6618 tmiller6@optonline.com	WILLIAM MILLER IBEW 17200 NE SACRAMENTO PORTLAND OR 97230 bill@ibew125.com
CHRISTY MONSON LEAGUE OF OREGON CITIES 1201 COURT ST. NE STE. 200 SALEM OR 97301 cmonson@orcities.org	MICHAEL MORGAN -- CONFIDENTIAL TONKON TORP LLP 888 SW 5TH AVE STE 1600 PORTLAND OR 97204-2099 mike@tonkon.com
FRANK NELSON 543 WILLAMETTE CT	NANCY NEWELL 3917 NE SKIDMORE

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26

MCMINNVILLE OR 97128 fnelson@viclink.com	PORTLAND OR 97211 ogec2@hotmail.com
JAMES NOTEBOOM -- CONFIDENTIAL KARNOPP PETERSEN NOTEBOOM ET AL 1201 NW WALL ST STE 300 BEND OR 97701 jdn@karnopp.com	LISA F RACKNER -- CONFIDENTIAL ATER WYNNE LLP 222 SW COLUMBIA ST STE 1800 PORTLAND OR 97201-6618 lfr@aterwynne.com
DONALD W SCHOENBECK -- CONFIDENTIAL REGULATORY & COGENERATION SERVICES INC 900 WASHINGTON ST STE 780 VANCOUVER WA 98660-3455 dws@r-c-s-inc.com	REBECCA SHERMAN -- CONFIDENTIAL HYDROPOWER REFORM COALITION 320 SW STARK STREET, SUITE 429 PORTLAND OR 97204 northwest@hydroreform.org
JOHN W STEPHENS -- CONFIDENTIAL ESLER STEPHENS & BUCKLEY 888 SW FIFTH AVE STE 700 PORTLAND OR 97204-2021 stephens@eslerstephens.com	BRETT SWIFT -- CONFIDENTIAL AMERICAN RIVERS 320 SW STARK ST, SUITE 418 PORTLAND OR 97204 bswift@amrivers.org
MITCHELL TAYLOR -- CONFIDENTIAL ENRON CORPORATION PO BOX 1188 1221 LAMAR - STE 1600 HOUSTON TX 77251-1188 mitchell.taylor@enron.com	LAURENCE TUTTLE CENTER FOR ENVIRONMENTAL EQUITY 610 SW ALDER #1021 PORTLAND OR 97205 nevermined@earthlink.net
S BRADLEY VAN CLEVE -- CONFIDENTIAL DAVISON VAN CLEVE PC 1000 SW BROADWAY STE 2460 PORTLAND OR 97205 mail@dvclaw.com	BENJAMIN WALTERS -- CONFIDENTIAL CITY OF PORTAND - OFFICE OF CITY ATTORNEY 1221 SW 4TH AVE - RM 430 PORTLAND OR 97204 bwalters@ci.portland.or.us
MICHAEL T WEIRICH -- CONFIDENTIAL DEPARTMENT OF JUSTICE 1162 COURT ST NE SALEM OR 97301-4096 michael.weirich@state.or.us	STEVEN WEISS NORTHWEST ENERGY COALITION 4422 OREGON TRAIL CT NE SALEM OR 97305 steve@nwenergy.org
ROBIN WHITE PORTLAND BOMA 1211 SW 5TH AVE STE 2722-MEZZANINE PORTLAND OR 97201 rwhite@bigplanet.com	LORNE WHITTLES EPCOR MERCHANT & CAPITAL (US) INC 1161 W RIVER ST STE 250 BOISE ID 83702 lwhittles@epcor.ca
LINDA K WILLIAMS -- CONFIDENTIAL	

1 KAFOURY & MCDOUGAL
2 10266 SW LANCASTER RD
3 PORTLAND OR 97219-6305
4 linda@lindawilliams.net

5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26