

ANN L. FISHER
Attorney at Law
AF Legal & Consulting Svcs
1425 SW 20th St., Suite 202
Portland, Oregon 97201
Telephone - 503.721-0181
Facsimile - 503.223-2305
BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON

In the Matter of) UM 1121
) SUPPLEMENTAL MEMO
OREGON ELECTRIC UTILITY COMPANY, LLC, et) Motion to Reopen the Record
)
al.) CONSIDERATION BY FULL COMMISSION
REQUESTED.
Application for Authorization to Acquire Portland
General Electric Company.

Portland Building Owners and Managers Association (BOMA) submits the following:

As the attached document makes clear, much is going on behind the scenes with respect to Oregon Electric Utility Company's (OEUC) plans for PGE. Here we find that OEUC intends to hold two additional companies – and it is equally obvious from their names (PGE Power Procurement Co, Portland General Transport Corp), these disclose OEUC's intent to migrate assets of PGE to unregulated affiliates out of the control of the OPUC and thereby saddling PGE customers with higher rates. For this reason alone, the commission should reopen the proceedings to investigate fully the intentions of OEUC and its untouchable parent, Texas Pacific Group.

Dated this 17th day of February 2005.

X

Ann L. Fisher
1425 SW 20th Street, Suite 202
Portland, Oregon 97201
503-721-0181
503-223-2305 - facsimile

Attachment: letter from Skadden Arps on behalf of PGE indicating the affiliates of OEUC.

ORIGINAL

SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP

1440 NEW YORK AVENUE, N.W.
WASHINGTON, DC 20005-2111

TEL: (202) 371-7000
FAX: (202) 393-5760
www.skadden.com

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SECRETARY
 2005 FEB -9 P 4: 57
 FEDERAL ENERGY REGULATORY COMMISSION

February 9, 2005

Magalie R. Salas
 Secretary
 Federal Energy Regulatory Commission
 888 First Street, N.E.
 Washington, D.C. 20426

RE: Docket Nos. ER04-1206-000 and ER04-1206-001

Dear Ms. Salas:

On January 21, 2005, Portland General Electric Company ("PGE"), Oregon Electric Utility Company ("OEUC") and Portland General Power Procurement Company ("PPC") submitted a supplement to their responses filed on January 18, 2005 (the "Initial Response") to the request for additional information issued by the Federal Energy Regulatory Commission ("FERC" or the "Commission") in the above-captioned docket on December 17, 2004, as amended. Attachment 1 hereto, a list of the PGE Energy Affiliates that would exist upon consummation of the transaction, was inadvertently omitted from the January 21, 2005 submittal.

PGE respectfully requests that the Commission provide a shortened notice period of no more than 10 days from the date of this filing.

Sincerely,



Clifford M. (Mike) Naeve
Skadden, Arps, Slate,
Meagher & Flom LLP
1440 New York Ave., N.W.
Washington, D.C. 20005
(202) 371-7070
mnaeve@skadden.com

*Attorney for Portland General Electric
Company*

cc: Sara Schotland
Steve P. Rodgers, FERC
Debra A. Dalton, FERC
Service List

Attachment 1

PGE Energy Affiliates

Portland General Electric Company*
121 SW Salmon Street, Portland, Oregon 97204

Portland General Transport Corp.*
121 SW Salmon Street, Portland, Oregon 97204

Portland General Power Procurement Company*
121 SW Salmon Street, Portland, Oregon 97204

PGE Energy Affiliate Corporate Structure
(Energy Affiliates listed in Bold)

Managing Member, LLC

Oregon Electric Utility Company, LLC (95% voting interest)

Portland General Electric Company (100%)

Portland General Power Procurement Company (100%)

Portland General Transport Corp. (100%)

PGE Marketing Affiliates

PGE Power Operations and Resource Planning
121 SW Salmon Street, Portland, Oregon 97204

PGE Power Supply Risk Management
121 SW Salmon Street, Portland, Oregon 97204

PGE Business & Governmental Customer & Economic Development
121 SW Salmon Street, Portland, Oregon 97204

* Also qualify as "Marketing Affiliates" as that term is now defined in 18 C.F.R. 358.3(k).

UNITED STATES OF AMERICA
FEDERAL ENERGY REGULATORY COMMISSION

Oregon Electric Utility Company) Docket Nos. ER04-1206-000
Portland General Electric Company) ER04-1206-001
Portland General Term Power)
Procurement Company)

NOTICE OF FILING

()

Take notice that, on February 9, 2005, Portland General Electric Company ("PGE") submitted a supplement to their January 21, 2005 and January 18, 2005 filings in this proceeding. PGE states that copies of the filing were served on parties on the official service list in the above-captioned proceeding.

Any person desiring to intervene or to protest this filing must file in accordance with Rules 211 and 214 of the Commission's Rules of Practice and Procedure (18 C.F.R. 385.211 and 385.214). Protests will be considered by the Commission in determining the appropriate action to be taken, but will not serve to make protestants parties to the proceeding. Any person wishing to become a party must file a notice of intervention or motion to intervene, as appropriate. Such notices, motions, or protests must be filed on or before the comment date. Anyone filing a motion to intervene or protest must serve a copy of that document on all parties to the proceeding.

The Commission encourages electronic submission of protests and interventions in lieu of paper using the "eFiling" link at <http://www.ferc.gov>. Persons unable to file electronically should submit an original and 14 copies of the protest or intervention to the Federal Energy Regulatory Commission, 888 First Street, N.E., Washington, D.C. 20426.

This filing is accessible on-line at <http://www.ferc.gov>, using the "eLibrary" link and is available for review in the Commission's Public Reference Room in Washington, D.C. There is an "eSubscription" link on the web site that enables subscribers to receive email notification when a document is added to a subscribed docket(s). For assistance with any FERC Online service, please email FERCOnlineSupport@ferc.gov, or call (866) 208-3676 (toll free). For TTY, call (202) 502-8659.

Comment Date: 5:00 pm Eastern Time on (insert date).

Magalie R. Salas
Secretary

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have this day served Supplement to Motion to Open Record on the official service list for Docket No. UM 1121, by causing the same to be electronically served on February 17, 2005 upon all parties who have an email address on the official service list, and by U.S. Mail on February 10, 2005, postage-prepaid, to those parties who do not have an email address on the official service list.

Dated at Portland, Oregon, this 17 February 2005

By: _____

Ann L. Fisher

JIM ABRAHAMSON COMMUNITY ACTION DIRECTORS OF OREGON 4035 12TH ST CUTOFF SE STE 110 SALEM OR 97302 jim@cado-oregon.org	SUSAN K ACKERMAN NIPPC PO BOX 10207 PORTLAND OR 97296-0207 susan.k.ackerman@comcast.net
GRIEG ANDERSON 5919 W MILES ST. PORTLAND OR 97219	JEANNE L ARANA OREGON HOUSING AND COMMUNITY SERVICES DEPT PO BOX 14508 SALEM OR 97301 jeanne.arana@hcs.state.or.us
KEN BEESON EUGENE WATER & ELECTRIC BOARD 500 EAST FOURTH AVENUE EUGENE OR 97440-2148 ken.beeson@eweb.eugene.or.us	JULIE BRANDIS ASSOCIATED OREGON INDUSTRIES 1149 COURT ST NE SALEM OR 97301-4030 jbrandis@aoi.org
KIM BURT WEST LINN PAPER COMPANY 4800 MILL ST WEST LINN OR 97068 kburt@wlinpco.com	J LAURENCE CABLE CABLE HUSTON BENEDICT ET AL 1001 SW 5TH AVE STE 2000 PORTLAND OR 97204-1136 lcable@chbh.com
K DEE CARLSON DEPT OF JUSTICE - GENERAL COUNSEL DIVISION 1162 COURT ST NE SALEM OR 97301-4096 d.carlson@doj.state.or.us	MICHAEL CARUSO 176 SW HEMLOCK DUNDEE OR 97115 carusodad@hotmail.com

JENNIFER CHAMBERLIN STRATEGIC ENERGY LLC 2633 WELLINGTON COURT CLYDE CA 94520 jchamberlin@sel.com	WILLIAM H CHEN CONSTELLATION NEWENERGY INC 2175 N CALIFORNIA BLVD STE 300 WALNUT CREEK CA 94596 bill.chen@constellation.com
JOAN COTE OREGON ENERGY COORDINATORS ASSOCIATION 2585 STATE ST NE SALEM OR 97301 cotej@mwvcaa.org	CHRIS CREAN MULTNOMAH COUNTY 501 SE HAWTHORNE, SUITE 500 PORTLAND OR 97214 christopher.d.crean@co.multnomah.or.us
MELINDA J DAVISON DAVISON VAN CLEVE PC 1000 SW BROADWAY STE 2460 PORTLAND OR 97205 mail@dvclaw.com	JIM DEASON CABLE HUSTON BENEDICT HAAGENSEN & LLOYD LLP 1001 SW FIFTH AVE STE 2000 PORTLAND OR 97204-1136 jdeason@chbh.com
JAMES DITTMER UTILITECH INC 740 NW BLUE PKWY STE 204 LEE'S SUMMIT MO 64086 jdittmer@utilitech.net	J JEFFREY DUDLEY PORTLAND GENERAL ELECTRIC 121 SW SALMON ST 1WTC1301 PORTLAND OR 97204 jay_dudley@pgn.com
GARY DUELL 11301 SE CHARVIEW COURT CLACKAMAS, OR OR 97015 gduell@bigplanet.com	JASON EISDORFER CITIZENS' UTILITY BOARD OF OREGON 610 SW BROADWAY STE 308 PORTLAND OR 97205 jason@oregoncub.org
JAMES F FELL STOEL RIVES LLP 900 SW 5TH AVE STE 2600 PORTLAND OR 97204-1268 jffell@stoel.com	ANN L FISHER AF LEGAL & CONSULTING SERVICES 1425 SW 20TH STE 202 PORTLAND OR 97201 energylaw@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 RENEWABLE NORTHWEST PROJECT 917 SW OAK - STE 303 PORTLAND OR 97205 ann@rnp.org

<p>PATRICK G HAGER PORTLAND GENERAL ELECTRIC 121 SW SALMON ST 1WTC0702 PORTLAND OR 97204 patrick_hager@pgn.com</p>	<p>ROY HENDERSON PENSION ENHANCEMENT COMMITTEE 895 NW DALE AVENUE PORTLAND OR 97229 royhensn@msn.com</p>
<p>MARY ANN HUTTON CANON AND HUTTON SOUTHERN OREGON OFFICE 1141 NW KRING ST ROSEBURG OR 97470 mah@canonandhutton.com</p>	<p>JOE JANSSENS PGE PENSION ENHANCEMENT COMMITTEE 24495 BUTTEVILLE RD NE AURORA OR 97002 osprey64@juno.com</p>
<p>VALARIE KOSS COLUMBIA RIVER PUD PO BOX 1193 SAINT HELENS OR 97051 vkoss@crpud.org</p>	<p>GEOFFREY M KRONICK LC7 BONNEVILLE POWER ADMINISTRATION PO BOX 3621 PORTLAND OR 97208-3621 gmkronick@bpa.gov</p>
<p>MICHAEL L KURTZ BOEHM, KURTZ & LOWRY 36 E 7TH ST STE 2110 CINCINNATI OH 45202 mkurtzlaw@aol.com</p>	<p>ROCHELLE LESSNER LANE, POWELL, SPEARS, LUBERSKY LLP 601 SW 2ND AVE. STE. 2100 PORTLAND OR 97204 lessnerr@lanepowell.com</p>
<p>KEN LEWIS 2880 NW ARIEL TERRACE PORTLAND OR 97210 kl04@mailstation.com</p>	<p>STEVEN G LINS GLENDALE, CITY OF 613 E BROADWAY STE 220 GLENDALE CA 91206-4394 slins@ci.glendale.ca.us</p>
<p>JAMES MANION WARM SPRINGS POWER ENTERPRISES PO BOX 960 WARM SPRINGS OR 97761 j_manion@wspower.com</p>	<p>LLOYD K MARBET DON'T WASTE OREGON 19142 S BAKERS FERRY RD BORING OR 97009 marbet@mail.com</p>
<p>GORDON MCDONALD PACIFIC POWER & LIGHT 825 NE MULTNOMAH STE 800 PORTLAND OR 97232 gordon.mcdonald@pacificcorp.com</p>	<p>DANIEL W MEEK DANIEL W MEEK ATTORNEY AT LAW 10949 SW 4TH AVE PORTLAND OR 97219 dan@meek.net</p>
<p>THAD MILLER OREGON ELECTRIC UTILITY COMPANY 222 SW COLUMBIA STREET, SUITE 1850 PORTLAND OR 97201-6618 tmiller6@optonline.com</p>	<p>WILLIAM MILLER IBEW 17200 NE SACRAMENTO PORTLAND OR 97230 bill@ibew125.com</p>
<p>CHRISTY MONSON LEAGUE OF OREGON CITIES 1201 COURT ST. NE STE. 200 SALEM OR 97301 cmonson@orcities.org</p>	<p>MICHAEL MORGAN TONKON TORP LLP 888 SW 5TH AVE STE 1600 PORTLAND OR 97204-2099 mike@tonkon.com</p>
<p>FRANK NELSON 543 WILLAMETTE CT MCMINNVILLE OR 97128 fnelson@viclink.com</p>	<p>NANCY NEWELL 3917 NE SKIDMORE PORTLAND OR 97211 ogec2@hotmail.com</p>

<p>JAMES NOTEBOOM KARNOPP PETERSEN NOTEBOOM ET AL 1201 NW WALL ST STE 300 BEND OR 97701 jdn@karnopp.com</p>	<p>LISA F RACKNER ATER WYNNE LLP 222 SW COLUMBIA ST STE 1800 PORTLAND OR 97201-6618 lfr@aterwynne.com</p>
<p>DONALD W SCHOENBECK REGULATORY & COGENERATION SERVICES INC 900 WASHINGTON ST STE 780 VANCOUVER WA 98660-3455 dws@r-c-s-inc.com</p>	<p>REBECCA SHERMAN HYDROPOWER REFORM COALITION 320 SW STARK STREET, SUITE 429 PORTLAND OR 97204 northwest@hydroreform.org</p>
<p>JOHN W STEPHENS ESLER STEPHENS & BUCKLEY 888 SW FIFTH AVE STE 700 PORTLAND OR 97204-2021 stephens@eslerstephens.com</p>	<p>BRETT SWIFT AMERICAN RIVERS 320 SW STARK ST, SUITE 418 PORTLAND OR 97204 bswift@amrivers.org</p>
<p>MITCHELL TAYLOR ENRON CORPORATION PO BOX 1188 1221 LAMAR - STE 1600 HOUSTON TX 77251-1188 mitchell.taylor@enron.com</p>	<p>LAURENCE TUTTLE CENTER FOR ENVIRONMENTAL EQUITY 610 SW ALDER #1021 PORTLAND OR 97205 nevermined@earthlink.net</p>
<p>S BRADLEY VAN CLEVE DAVISON VAN CLEVE PC 1000 SW BROADWAY STE 2460 PORTLAND OR 97205 mail@dvclaw.com</p>	<p>BENJAMIN WALTERS CITY OF PORTLAND - OFFICE OF CITY ATTORNEY 1221 SW 4TH AVE - RM 430 PORTLAND OR 97204 bwalters@ci.portland.or.us</p>
<p>MICHAEL T WEIRICH DEPARTMENT OF JUSTICE 1162 COURT ST NE SALEM OR 97301-4096 michael.weirich@state.or.us</p>	<p>STEVEN WEISS NORTHWEST ENERGY COALITION 4422 OREGON TRAIL CT NE SALEM OR 97305 steve@nwenergy.org</p>
<p>ROBIN WHITE PORTLAND BOMA 1211 SW 5TH AVE STE 2722-MEZZANINE PORTLAND OR 97201 rwhite@bigplanet.com</p>	<p>LORNE WHITTLES EPCOR MERCHANT & CAPITAL (US) INC 1161 W RIVER ST STE 250 BOISE ID 83702 lwhittles@epcor.ca</p>
<p>LINDA K WILLIAMS KAFOURY & MCDUGAL 10266 SW LANCASTER RD PORTLAND OR 97219-6305 linda@lindawilliams.net</p>	