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October 21, 2005

***Via Electronic Filing and U.S. Mail***

Oregon Public Utility Commission  
Attention: Filing Center  
PO Box 2148  
Salem OR 97308-2148

Re: UTILITY REFORM PROJECT and KEN LEWIS, Complainants, vs.  
PORTLAND GENERAL ELECTRIC, Defendant  
OPUC Docket No. UM 1226

Attention Filing Center:

Enclosed for filing in the above-captioned docket is Portland General Electric's Motion for Extension of Time to Respond to Complaint. This document is being filed by electronic mail with the Filing Center.

An extra copy of this cover letter is enclosed. Please date stamp the extra copy and return it to me in the envelope provided.

Thank you in advance for your assistance.

Sincerely,

/s/ DOUGLAS C. TINGEY

DCT:am

cc: UM 1226 Service List

Enclosure

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day caused the foregoing MOTION FOR EXTENSION OF TIME TO RESPOND TO COMPLAINT OF PORTLAND GENERAL ELECTRIC to be served by First Class US Mail, postage prepaid and properly addressed, and by electronic mail, upon the following parties from the official service list in Docket No. UM 1226:

DANIEL W MEEK  
DANIEL W MEEK ATTORNEY AT LAW  
10949 SW 4TH AVE  
PORTLAND OR 97219  
dan@meek.net

LINDA K WILLIAMS  
KAFOURY & MCDUGAL  
10266 SW LANCASTER RD  
PORTLAND OR 97219-6305  
linda@lindawilliams.net

Dated at Portland, Oregon, this 21<sup>st</sup> day of October, 2005.

/s/ DOUGLAS C. TINGEY  
Douglas C. Tingey

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**UM 1226**

**UTILITY REFORM PROJECT and  
KEN LEWIS,**

**Complainants,**

**vs.**

**PORTLAND GENERAL ELECTRIC  
COMPANY,**

**Defendant**

**MOTION FOR EXTENSION OF TIME  
TO RESPOND TO COMPLAINT**

**[EXPEDITED CONSIDERATION  
REQUESTED]**

Pursuant to ORS 756.512 and OAR 860-013-0031, Portland General Electric (“PGE”) hereby moves the Public Utility Commission of Oregon (“Commission”) for an Extension of Time to respond to the Complaint in this docket. In support of this Motion PGE states as follows:

1. On October 5, 2005, the Utility Reform Project and Ken Lewis (“Complainants”) filed the subject Complaint against PGE.
2. On October 7, 2005, the Commission notified PGE that an Answer to the Complaint was due October 27, 2005.
3. ORS 756.512 provides that PGE is to respond to the complaint by the date stated by the Commission, “or such further time as the commission shall fix.”
4. Due to the demands of other pending matters, PGE seeks an extension of time to respond to the Complaint. PGE has contacted counsel for Complainants and counsel does not object to an extension of the deadline to respond to November 10, 2005.

5. Due to the short time before the response to the Complaint is currently due, PGE requests expedited consideration of this motion.

6. For the reasons stated above, PGE requests that the deadline for PGE to respond to the Complaint be extended to November 10, 2005.

DATED this 21<sup>st</sup> day of October, 2005.

Respectfully submitted,

/s/ DOUGLAS C. TINGEY

Douglas C. Tingey, OSB No. 04436  
Assistant General Counsel  
Portland General Electric Company  
121 SW Salmon Street, 1WTC1301  
Portland, Oregon 97204  
(503) 464-8926 phone  
(503) 464-2200 fax  
doug.tingey@pgn.com