

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UE 180/ UE 181/UE 184

In the Matters

PORTLAND GENERAL ELECTRIC
COMPANY

Request for a General Rate Revision (UE 180)

Annual Adjustments to Schedule 125 (UE
181)

Request for a General Rate Revision relating
to the Port Westward Plant (UE 184)

REQUEST TO ALLOW BRIEF IN EXCESS OF
FIFTY PAGES

Staff of the Public Utility Commission of Oregon (“staff”) asks that the administrative law judge (“ALJ”) allow submission of a brief in excess of 50 pages. The administrative rule governing submission of written argument does not include a page limit. However, a page limit is found on the Commission’s website under the page titled “Tips on PUC Practice and Procedures.” A paragraph found on that page specifies that no brief should exceed 50 pages, unless the presiding ALJ grants permission otherwise.”

Counsel for staff was not aware of this limitation until after she filed the Staff Opening Brief in the above-captioned cases. The Staff Opening Brief is 61 pages long. Staff asks that ALJ allow submission of a brief that exceeds 50 pages because the issues presented in this case

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1 are complex; several hundred pages of testimony were presented on these issues. Further, staff
2 believes that the Commission and parties are benefited by a complete discussion of the issues
3 presented in the case.

4 DATED this 20th day of November 2006.

6 Respectfully submitted,

7 HARDY MYERS
8 Attorney General

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Stephanie S. Andrus, #92512
11 Assistant Attorney General
12 Of Attorneys for Staff of the Public Utility
13 Commission of Oregon

1 **CERTIFICATE OF SERVICE**

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3 I certify that on November 20, 2006, I served the foregoing Request to Allow Brief in
4 Excess of Fifty Pages upon all parties of record in this proceeding by electronic mail and by
5 mailing a copy by postage prepaid first class mail or by hand delivery/shuttle mail to the parties
6 accepting paper service.

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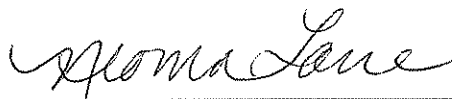
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