

1 in Marion County Circuit Court to recover the unlawful charges to PGE ratepayers
2 for Trojan return on investment during the same 5.5-year period that is the subject
3 of this phase of this proceeding. PGE's extension of time compelled undersigned
4 counsel to seek an extension of time for replying to that memorandum until July 26,
5 2005. Thus, undersigned counsel is overwhelmingly engaged in preparing a
6 memorandum for the Oregon Supreme Court proceeding that may cause much of
7 all of this phase of this proceeding to be moot.

8 Granting this motion will not cause prejudice to PGE, as PGE will continue to
9 have 20 days until the date for filing of its surrebuttal testimony. Further, URP
10 would not object to a similar extension of that deadline.

11 Undersigned counsel provided a draft of this motion to counsel for PGE, Jay
12 Dudley, very late on July 22. Nevertheless, PGE counsel responded that PGE
13 does not object to this request.

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15 Dated: July 22, 2005

Respectfully Submitted,

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DANIEL W. MEEK
10949 S.W. 4th Avenue
Portland, OR 97219
503-293-9021 voice
503-293-9099 fax
dan@meek.net

Attorney for
Utility Reform Project

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CERTIFICATE OF SERVICE

I hereby certify that I served a true copy of the foregoing MOTION FOR 3-DAY EXTENSION OF TIME TO FILE URP SURREBUTTAL TESTIMONY BY UTILITY REFORM PROJECT by email to the email addresses shown below, which comprise the service list on the Commission's web site as of this day.

STEPHANIE S ANDRUS DEPARTMENT OF JUSTICE 1162 COURT ST NE SALEM OR 97301-4096 stephanie.andrus@state.or.us	PAUL A GRAHAM DEPARTMENT OF JUSTICE 1162 COURT ST NE SALEM OR 97301-4096 paul.graham@state.or.us
PATRICK G. HAGER PORTLAND GENERAL ELECTRIC 121 SW SALMON ST 1WTC0702 PORTLAND OR 97204 patrick_hager@pgn.com	JEFFREY DUDLEY PORTLAND GENERAL ELECTRIC 121 SW SALMON ST 1WTC1301 PORTLAND OR 97204 jay_dudley@pgn.com
LINDA K WILLIAMS KAFOURY & MCDUGAL 10266 SW LANCASTER RD PORTLAND OR 97219-6305 linda@lindawilliams.net	

Dated: July 22, 2005

Daniel W. Meek