1	BEFORE THE PUBLIC UTILITY COMMISSION		
2	OF OREGON		
3	UE 204		
4			
5	In the Matter of		
6	PORTLAND GENERAL ELECTRIC COMPANY	MOTION TO SUSPEND TARIFFS FOR AN ADDITIONAL THREE MONTHS	
7	Request for recovery of costs associated with its Selective Water Withdrawal Project	[Expedited Consideration Requested]	
8			
9	INTRODUCTION		
10	The Public Utility Commission of Oregon Staff ("Staff") respectfully requests that the		
11	Public Utility Commission of Oregon ("Commission") enter an order further suspending the		
12	revised tariffs schedules in Advice No. 08-15, docketed as UE 204, for an additional three		
13	months or August 24, 2009. Because the current schedule established under a six month		
14	suspension period provides for Staff and Intervenor Reply Testimony in one week, Staff		
15	respectfully requests expedited consideration of this motion. The Citizens' Utility Board and the		
16	Industrial Customers of the Northwest Utilities support this motion. If the Commission were to		
17	grant this motion, Staff respectfully requests that the Commission schedule a prehearing		
18	conference to adopt a new schedule in the proceeding.		
19	DISCUSSION		
20	In a stipulation filed in Docket UE 197, the parties to the stipulation agreed that the		
21	Selective Water Withdrawal Project ("SWW") would be the subject of a separate docket, which		
22	is now docketed as UE 204. The parties also agreed that they would make a good-faith effort to		
23	complete the SWW docket within a timeframe that would allow for a Commission decision such		
24	that rates that include recovery of approved costs from the SWW docket may be effective the		
25	latter part of May 2009, or when the SWW project is closed to plant for accounting purposes.		
26	See UE 197 Stipulation Regarding Revenue Re	quirement at 2(b)(2) (October 9, 2008). By	

agreement of the parties in UE 204, the schedule was modified by a ruling issued February 3, 1 2 2009, with an expected Commission decision date of the latter half of May. 3 The UE 204 parties have worked in good faith to comply with the modified schedule in this proceeding. The SWW project is a unique project and the review of the project has been 4 5 complex. The review of this project is further complicated by cost estimates that are currently 30 percent above Portland General Electric's (PGE) original forecasts. Staff believes it is critical to 6 7 understand the nature of the cost over-runs, and whether general contracting and design costs are 8 within reasonable market standards. This level of review requires significant time on Staff's part 9 in order to sufficiently gain an understanding of the complexity of the project itself. 10 Furthermore, the SWW project will not be fully initially tested, nor will all the project 11 costs be closed to book in a timeframe that will allow the parties sufficient time to review the 12 initial performance of, and the actual costs of, the project. 13 According to ORS 757.215(1), the Commission may enter an order further suspending 14 tariffs for three months beyond the initial suspension, if the Commission finds that more time is 15 needed for investigation. As detailed above, the parties have worked in good faith to complete 16 the investigation and prepare recommendations for the Commission, but the uniqueness and 17 complexity of the SWW project demands further investigation. 18 /// 19 /// 20 /// 21 /// 22 /// 23 /// 24 /// 25 /// 26 ///

1	For the foregoing reasons, Staff respectfully urges the Commission to enter an order		
2	suspending PGE's revised tariff schedules in Advice No. 08-15 (UE 204) for an additional three		
3	months, which is August 24, 2009.		
4	DATED this 13th day of February 2009.		
5			
6	Respectfully submitted,		
7	JOHN R. KROGER Attorney General		
8			
9			
10	Jason W. Jones, #00059 Assistant Attorney General		
11	Of Attorneys for the Public Utility Commission of Oregon Staff		
12			
13			
14			
15			
16			
17			
18			
19			
20			
21			
22			
23			
24			
25			
26			

Page 3 - MOTION TO SUSPEND TARIFFS FOR AN ADDITIONAL THREE MONTHS JWJ/nal/#1288459

l	CERTIFICATE OF SERVICE		
2	I certify that on February 13 2009, I served the foregoing Motion to Suspend Tariffs	for	
3	an Additional Three Months upon all parties of record in this proceeding by delivering a cop	y by	
4	electronic mail. Hard copy will be sent by postage prepaid first class mail or by hand		
5	delivery/shuttle mail to the parties accepting paper service on Tuesday, February 17.		
6	W		
7	CITIZEN'S UTILITY BOARD OF OREGON G. CATRIONA MCCRACKEN - CONFIDENTIAL LEGAL COUNSEL/STAFF ATTY		
8	610 SW BROADWAY - STE 308 PORTLAND OR 97205		
9	catriona@oregoncub.org		
10	DAVISON VAN CLEVE PC S BRADLEY VAN CLEVE - CONFIDENTIAL 333 SW TAVIOR - STE 400		
11	333 SW TAYLOR - STE 400 PORTLAND OR 97204 mail@dvclaw.com		
12	OREGON PUBLIC UTILITY COMMISSION		
13	CARLA OWINGS <b>– CONFIDENTIAL</b> REVENUE REQUIREMENTS ANALYST PO BOX 2148		
14	SALEM OR 97308-2148 carla.m.owings@state.or.us		
15	PORTLAND GENERAL ELECTRIC RANDALL DAHLGREN - CONFIDENTIAL		
16	RATES & REGULATORY AFFAIRS 121 SW SALMON ST 1WTC 0702		
17	PORTLAND OR 97204 pge.opuc.filings@pgn.com		
18	PORTLAND GENERAL ELECTRIC DOUGLAS C TINGEY - CONFIDENTIAL		
19	ASST GENERAL COUNSEL 121 SW SALMON 1WTC13		
20	PORTLAND OR 97204 doug.tingey@pgn.com		
21			
22	Alona Lane		
23	Legal Secretary		
24	Department of Justice Regulated Utility & Business Section		
25			
26			

Page 1 - CERTIFICATE OF SERVICE - UE 204