

1 agreement of the parties in UE 204, the schedule was modified by a ruling issued February 3,
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
4 this proceeding. The SWW project is a unique project and the review of the project has been
5 complex. The review of this project is further complicated by cost estimates that are currently 30
6 percent above Portland General Electric's (PGE) original forecasts. Staff believes it is critical to
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.

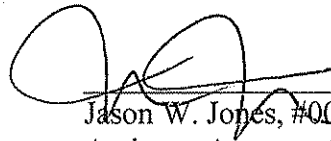
18 ///
19 ///
20 ///
21 ///
22 ///
23 ///
24 ///
25 ///
26 ///

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
8 Attorney General

9
10 
11 Jason W. Jones, #00059
12 Assistant Attorney General
13 Of Attorneys for the Public Utility Commission
14 of Oregon Staff
15
16
17
18
19
20
21
22
23
24
25
26

1 **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 copy 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.

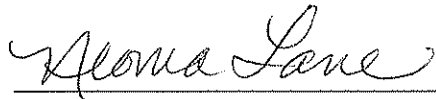
6 **W**
7 **CITIZEN'S UTILITY BOARD OF OREGON**
8 G. CATRIONA MCCrackEN - **CONFIDENTIAL**
9 LEGAL COUNSEL/STAFF ATTY
610 SW BROADWAY - STE 308
PORTLAND OR 97205
catriona@oregoncub.org

10 **DAVISON VAN CLEVE PC**
11 S BRADLEY VAN CLEVE - **CONFIDENTIAL**
333 SW TAYLOR - STE 400
PORTLAND OR 97204
mail@dvclaw.com

12 **OREGON PUBLIC UTILITY COMMISSION**
13 CARLA OWINGS - **CONFIDENTIAL**
14 REVENUE REQUIREMENTS ANALYST
PO BOX 2148
SALEM OR 97308-2148
carla.m.owings@state.or.us

15 **PORTLAND GENERAL ELECTRIC**
16 RANDALL DAHLGREN - **CONFIDENTIAL**
17 RATES & REGULATORY AFFAIRS
121 SW SALMON ST 1WTC 0702
PORTLAND OR 97204
pge.opuc.fillings@pgn.com

18 **PORTLAND GENERAL ELECTRIC**
19 DOUGLAS C TINGEY - **CONFIDENTIAL**
20 ASST GENERAL COUNSEL
121 SW SALMON 1WTC13
PORTLAND OR 97204
doug.tingey@pgn.com

21
22 

23 Neoma Lane
24 Legal Secretary
25 Department of Justice
26 Regulated Utility & Business Section