



Portland General Electric Company
Legal Department
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Douglas C. Tingey
Assistant General Counsel

December 14, 2005

Via Electronic Filing and U.S. Mail

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

Re: In the Matter of the Complaint of SP NEWSPRINT CO. against
PORTLAND GENERAL ELECTRIC COMPANY
OPUC Docket No. UM 1235

Attention Filing Center:

Enclosed for filing in the above-captioned docket is the Answer of PGE to Complaint of SP Newsprint. 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 1235 Service List

Enclosure

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 1235

SP NEWSPRINT CO.,)	ANSWER OF PORTLAND
)	GENERAL ELECTRIC COMPANY
Complainant,)	
)	
v.)	
)	
PORTLAND GENERAL)	
ELECTRIC COMPANY)	
)	
Defendant.)	

On December 2, 2005, SP Newsprint Co. (“SP Newsprint”) filed a complaint against Portland General Electric Company (“PGE”) with the Public Utility Commission of Oregon (“Commission”). For its answer to plaintiff’s Complaint, PGE admits and denies as follows:

1. With respect to paragraph 1 of the Complaint, PGE admits that SP Newsprint operates a mill in Newberg, Oregon, but as to the balance of the allegations in paragraph 1, PGE is without sufficient knowledge or information to form a belief as to the truth of the allegations, and therefore denies them.

2. PGE admits the allegations contained in paragraphs 2 and 3 of the Complaint.

3. PGE denies the allegations contained in paragraph 4 of the Complaint.

4. With respect to paragraph 5 of the Complaint, PGE admits that SP Newsprint takes service under Schedule 75, Partial Requirements Service. PGE further admits that Schedule 75 is available to large, non-residential customers that supply all or some portion of their load by self generation operating on a regular basis. To the extent that paragraph 5 purports

to construe Schedule 75, PGE states that the tariff speaks for itself and neither admits nor denies those allegations. PGE denies any other allegations in paragraph 5.

5. PGE admits the allegations contained in paragraph 6 of the Complaint.

6. PGE denies the allegations contained in paragraphs 7 of the Complaint.

7. PGE is without sufficient knowledge or information to form a belief as to the truth of the allegations contained in paragraph 8 of plaintiff's Complaint, and therefore denies them.

8. In response to paragraph 9 of the Complaint, PGE admits that on October 28, 2005, SP submitted a request to modify its Baseline Demand from 2 MW to 20 MW. PGE denies all other allegations in paragraph 9.

9. In response to paragraph 10 of the Complaint PGE admits that on November 1, 2005, PGE notified SP Newsprint that SP Newsprint had not met the requirements under Schedule 75 to increase its Baseline Demand under Schedule 75. PGE also admits that it has filed Advice Filing 05-17 to modify Schedule 75. PGE denies all other allegations in paragraph 10.

10. In response to paragraph 11 of the Complaint, PGE reasserts its responses to paragraphs 1 through 10 of the Complaint.

11. PGE admits the allegations in paragraphs 12 and 13 of the Complaint.

12. In response to paragraph 14 of the Complaint, PGE admits that on November 1, 2005, it notified SP that SP had not met the requirements under Schedule 75 to increase its Baseline Demand under Schedule 75. PGE denies all other allegations contained in paragraph 14 of the Complaint.

13. PGE denies the allegations in paragraph 15 of the Complaint.

14. In response to paragraph 16 of the Complaint, PGE reasserts its responses to paragraphs 1 through 15 of the Complaint.

15. PGE admits the allegations in paragraph 17 of the Complaint.

16. In response to paragraph 18, PGE admits that Schedule 75 provides for modifications to a customer's Baseline Demand if the requirements of Schedule 75 are met. PGE denies all other allegations in paragraph 18 of the Complaint.

17. PGE denies the allegations in paragraph 19 of the Complaint.

18. In response to paragraph 20 of the Complaint, PGE reasserts its responses to paragraphs 1 through 19 of the Complaint.

19. Paragraph 21 of the Complaint contains legal opinions or purported construction of statutes and rules. Those statutes and rules speak for themselves. PGE denies all other allegations in paragraph 21.

20. In response to paragraph 22 of the Complaint, PGE admits that Schedule 75 allows the Baseline Demand of a customer to be modified under certain circumstances. PGE denies all other allegations contained in paragraph 22 of the Complaint.

21. In response to paragraph 23 of the Complaint, PGE admits that SP Newsprint requested to modify its Baseline Demand on October 28, 2005. PGE further admits that PGE filed Advice Filing 05-17 after October 28, 2005. PGE denies all other allegations in paragraph 23.

22. In response to paragraph 24, PGE admits that it must provide service to customers under its current tariffs. PGE denies all other allegations in paragraph 24.

23. PGE denies the allegations in paragraph 25 of the Complaint.

24. In response to paragraph 26 of the Complaint, PGE reasserts its responses to paragraphs 1 through 25 of the Complaint.

25. PGE admits the allegations in paragraph 27 of the Complaint.

26. PGE denies the allegations contained in paragraphs 28, 29, 30 and 31 of the Complaint.

27. Except as expressly admitted above, PGE denies each and every other allegation of plaintiff's Complaint.

THEREFORE, having fully answered plaintiff's Complaint, PGE prays for judgment dismissing the Complaint.

Dated this 14th day of December, 2005.

Respectfully submitted,

/s/ DOUGLAS C. TINGEY

DOUGLAS C. TINGEY, OSB No. 04436

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CERTIFICATE OF SERVICE

I hereby certify that I have this day caused the **Answer of PGE to Complaint of SP Newsprint** to be served by First Class US Mail, postage prepaid and properly addressed, and by electronic mail, upon each party on the following official service list in this proceeding:

TAMARA FAUCETTE CABLE HUSTON BENEDICT HAAGENSEN & LLOYD LLP 1001 SW 5TH AVE STE 2000 PORTLAND OR 97204 tfaucette@chbh.com	CHAD M STOKES CABLE HUSTON BENEDICT HAAGENSEN & LLOYD, LLP 1001 SW 5TH - STE 2000 PORTLAND OR 97204 cstokes@chbh.com
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Dated at Portland, Oregon, this 14th day of December, 2005.

/s/ DOUGLAS C. TINGEY

Douglas C. Tingey

CERTIFICATE OF SERVICE