

1 **BEFORE THE PUBLIC UTILITY COMMISSION**
2 **OF OREGON**
3 **DR 10/UE 88/UM 989**

4 In the Matters of
5 The Application of Portland General Electric
6 Company for an Investigation into Least Cost
7 Plan Plant Retirement (DR 10),
8 Revised Tariff Schedules for Electric Service
9 in Oregon filed by Portland General Electric
10 Company (UE 88),
11 Portland General Electric Company's
12 Application for an Accounting Order and for
13 Order Approving Tariff Sheets Implementing
14 Rate Reduction (UM 989).

STAFF RESPONSE TO PORTLAND GENERAL
ELECTRIC COMPANY'S MOTION FOR
LEAVE TO FILE SUPPLEMENTAL
TESTIMONY

12 Portland General Electric Company ("PGE") has asked the administrative law judge to
13 consolidate the phases of the above-captioned proceedings and re-open the record. PGE has also
14 asked for leave to file additional testimony and proposed a procedural schedule that would allow
15 staff and intervenors in these dockets to file response testimony, followed by PGE's rebuttal
16 testimony and a hearing. Staff supports PGE's request to consolidate the phases of these dockets
17 and allow additional testimony. However, staff does not support the procedural schedule
18 proposed by PGE because it does not allow sufficient time for staff and intervenors to file
19 responsive testimony.

20 PGE filed its supplemental testimony on January 31, 2007, and proposes that staff and
21 intervenors respond to this testimony on March 2, 2007. Because the administrative law judge
22 has not ruled on PGE's requests, staff has not begun preparing its responsive testimony. In light
23 of staff's current workload, staff asks that the administrative law judge give staff and intervenors
24
25
26

1 until March 30, 2007, to file responsive testimony. Staff also requests that the administrative law
2 judge allow at least two weeks between PGE's rebuttal testimony and the hearing in this matter.

3

4

DATED this 9th day of February 2007.

5

Respectfully submitted,

6

HARDY MYERS

7

Attorney General

8

/s/Stephanie S. Andrus

9

Stephanie S. Andrus, #92512

10

Assistant Attorney General

11

Of Attorneys for staff of the Public

12

Utility Commission of Oregon

13

14

15

16

17

18

19

20

21

22

23

24

25

26

CERTIFICATE OF SERVICE

I hereby certify that on the 9th day of February 2007, I served the foregoing document upon all parties of record in this proceeding by the methods indicated below:

J JEFFREY DUDLEY-- **CONFIDENTIAL**
PORTLAND GENERAL ELECTRIC
121 SW SALMON ST 1WTC1300
PORTLAND OR 97204
jay.dudley@pgn.com

HAND DELIVER
 U.S. MAIL
 OVERNIGHT MAIL
 FACSIMILE
 ELECTRONIC MAIL

PAUL GRAHAM -- **CONFIDENTIAL**
DEPARTMENT OF JUSTICE
REGULATED UTILITY & BUSINESS SECTION
1162 COURT ST NE
SALEM OR 97301-4096
paul.graham@state.or.us

HAND DELIVER
 U.S. MAIL
 OVERNIGHT MAIL
 FACSIMILE
 ELECTRONIC MAIL

PATRICK G HAGER
PORTLAND GENERAL ELECTRI
MANAGER, REGULATORY AFFAIRS
121 SW SALMON ST 1WTC0702
PORTLAND OR 97204
patrick.hager@pgn.com.

HAND DELIVER
 U.S. MAIL
 OVERNIGHT MAIL
 FACSIMILE
 ELECTRONIC MAIL

DAVID HATTON
ASSISTANT ATTORNEY GENERAL
REGULATED UTILITY & BUSINESS SECTION
1162 COURT ST NE
SALEM OR 97301-4096
david.hatton@state.or.us

HAND DELIVER
 U.S. MAIL
 OVERNIGHT MAIL
 FACSIMILE
 ELECTRONIC MAIL

DANIEL W MEEK -- **CONFIDENTIAL**
DANIEL W MEEK ATTORNEY AT LAW
10949 SW 4TH AVE
PORTLAND OR 97219
dan@meek.net

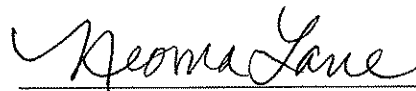
HAND DELIVER
 U.S. MAIL
 OVERNIGHT MAIL
 FACSIMILE
 ELECTRONIC MAIL

RATES & REGULATORY AFFAIRS
PORTLAND GENERAL ELECTRIC CO.
121 SW SALMON ST - 1WTC0702
PORTLAND OR 97204
pge.opuc.filings@pgn.com

HAND DELIVER
 U.S. MAIL
 OVERNIGHT MAIL
 FACSIMILE
 ELECTRONIC MAIL

LINDA K WILLIAMS
KAFOURY & MCDUGAL
10266 SW LANCASTER RD
PORTLAND OR 97219-6305
linda@lindawilliams.net

HAND DELIVER
 U.S. MAIL
 OVERNIGHT MAIL
 FACSIMILE
 ELECTRONIC MAIL



Legal Secretary
Department of Justice
Regulated Utility & Business Section