

1 **BEFORE THE OREGON PUBLIC UTILITIES COMMISSION**

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3 **DR 10/UE 88/UM 989**
4

5 **In the Matters of**

6
7 **The Application of Portland General**
8 **Electric Company for an Investigation into**
9 **Least Cost Plan Plant Retirement. (DR 10)**

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11 **Revised Tariffs Schedules for Electric**
12 **Service in Oregon Filed by Portland**
13 **General Electric Company. (UE 88)**
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15 **Portland General Electric Company's**
16 **Application for an Accounting Order and**
17 **for Order Approving Tariff Sheets**
18 **Implementing Rate Reduction. (UM 989)**
19
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MOTION FOR 21-
DAY EXTENSION
OF TIME TO FILE
INTERVENORS'
TESTIMONY

21 The Utility Reform Project (URP) and the Class Action Plaintiffs (Morgan,
22 Gearhart, and Kafoury Brothers, LLC) move for a 21-day extension of time to file
23 responsive testimony in this proceeding (from April 19 to May 10, 2005).

24 Efforts by URP and the class action plaintiffs (CAPs) to obtain the services of
25 experts on a pro bono or otherwise reduced fee basis have fallen through, once the
26 enormous scope of the subject matter of the proceeding has become understood.

27 URP and the CAPs need more time to retain one or more experts or to
28 determine that obtaining such experts is not possible.

1 The ability of counsel to devote the necessary time to this matter has also
2 been impaired by the near-constant activity in the Oregon Legislature on matters
3 pertaining to the ownership of, and taxes not paid by, PGE.

4 The remaining schedule for the proceeding would need to be adjusted.

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6 Dated: April 18, 2005

Respectfully Submitted,

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 Project, et al.

CERTIFICATE OF SERVICE

I hereby certify that I FILED THE ORIGINAL and 5 copies of the foregoing APPLICATION FOR RECONSIDERATION OF OPUC ORDER NO. 04-597 BY UTILITY REFORM PROJECT AND THE CLASS ACTION PLAINTIFFS by hand delivery and further that I served a true copy of the foregoing MOTION FOR 21-DAY EXTENSION OF TIME TO FILE INTERVENORS' TESTIMONY by email to the email addresses shown below, which comprise the service list on the Commission's web site as of this day.

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Dated: April 18, 2005

Daniel W. Meek