

1 **BEFORE THE OREGON PUBLIC UTILITIES COMMISSION**

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

4 **In the Matters of**

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

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10 **Revised Tariffs Schedules for Electric**
11 **Service in Oregon Filed by Portland General**
12 **Electric Company. (UE 88)**

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15 **Portland General Electric Company's**
16 **Application for an Accounting Order and for**
17 **Order Approving Tariff Sheets Implementing**
18 **Rate Reduction. (UM 989)**

MOTION FOR EXTENSION
OF TIME TO FILE URP
SURREBUTTAL
TESTIMONY

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21 URP requests an extension of time for the filing of its surrebuttal testimony,
22 taking the date from July 28 to Monday, August 1, 2005.

23 This extension is warranted for several reasons. First, the ALJ did not rule on
24 the PGE Motion to Strike, filed on June 14, 2005, until near close of business on
25 July 25. Without knowing which elements of its opening testimony may be stricken,
26 it was not possible for URP to focus on preparing the correct surrebuttal testimony.

27 Second, URP's witness was required to be out of town on family business this
28 week and upon returning has been fully committed to all-day settlement
29 conferences and other proceedings in the State of Washington.

1 Undersigned counsel communicated this request for extension to counsel for
2 PGE (Jay Dudley, the PGE counsel who has responded on such matters in the
3 past) and for OPUC Staff (Stephanie Andrus) by email at 1:30 p.m. today. Counsel
4 for OPUC Staff responded a few moments ago with, stating no objection.
5 Undersigned counsel has also left a phone message with PGE counsel, Jay
6 Dudley, but has not heard back by email or phone.

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8 Dated: July 27, 2005

Respectfully Submitted,

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Attorney for
Utility Reform Project

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CERTIFICATE OF SERVICE

I hereby certify that I served a true copy of the foregoing MOTION FOR EXTENSION OF TIME TO FILE URP SURREBUTTAL TESTIMONY BY UTILITY REFORM PROJECT by email to the email addresses shown below, which comprise the service list on the Commission's web site as of this day.

STEPHANIE S ANDRUS DEPARTMENT OF JUSTICE 1162 COURT ST NE SALEM OR 97301-4096 stephanie.andrus@state.or.us	PAUL A GRAHAM DEPARTMENT OF JUSTICE 1162 COURT ST NE SALEM OR 97301-4096 paul.graham@state.or.us
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Dated: July 27, 2005

Daniel W. Meek