

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

(errata corrected and
refiled)

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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. OPUC does not object,
23 and conditioned as noted below, PGE does not object. This request was filed on
24 July 27, 2005, and this motion corrects errata and is filed by attorney Linda
25 Williams, as directed by the hearings officer.

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

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

4 Undersigned counsel discussed this request for extension of time with Ms.
5 Chamberlain, of attorneys for PGE, who stated that PGE did not object so long as
6 undersigned agreed that any PGE reply to said surrebuttal would be due on August
7 23, 2005, and no request was made to postpone the hearing, to which undersigned
8 agreed.

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10 Dated: July 28, 2005

Respectfully Submitted,

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Attorney for
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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 28, 2005

Linda K. Williams