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November 20, 2006

Via Electronic and U.S. Mail

Public Utility Commission
Attn: Filing Center
550 Capitol St. NE #215
P.O. Box 2148
Salem OR 97308-2148

Re: In the Matter of PORTLAND GENERAL ELECTRIC COMPANY
Request for a General Rate Revision
Docket Nos. UE 180/UE 181/UE 184

Dear Filing Center:

Enclosed please find an original and two copies of the Request to File a Brief in Excess of 50 Pages of the Industrial Customers of Northwest Utilities ("ICNU") in the above-referenced docket numbers.

Please return one file-stamped copy of the document in the self-addressed, stamped envelope provided. Thank you for your assistance.

Sincerely yours,

/s/ Ruth A. Miller

Ruth A. Miller

Enclosures

cc: Service List

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have this day served the foregoing Request to File a Brief in Excess of 50 Pages of the Industrial Customers of Northwest Utilities upon the parties, on the official service list, by causing the same to be electronically served, to those parties with an email address, as well as mailed, postage-prepaid, through the U.S. Mail.

Dated at Portland, Oregon, this 20th day of November, 2006.

/s/ Ruth A. Miller
Ruth A. Miller

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**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UE 180/UE 181/UE 184

In the Matter of)
)
PORTLAND GENERAL ELECTRIC)
COMPANY)
)
Request for a General Rate Revision)
(UE 180),)
_____)

In the Matter of)
)
PORTLAND GENERAL ELECTRIC)
COMPANY)
)
Annual Adjustments to Schedule 125 (2007)
RVM Filing) (UE 181),)
_____)

In the Matter of)
)
PORTLAND GENERAL ELECTRIC)
COMPANY)
)
Request for a General Rate Revision relating)
to the Port Westward plant (UE 184).)
_____)

THE INDUSTRIAL CUSTOMERS OF
NORTHWEST UTILITIES' REQUEST TO
FILE BRIEF IN EXCESS OF FIFTY
PAGES

The Industrial Customers of Northwest Utilities (“ICNU”) requests that Administrative Law Judge (“ALJ”) Christina Hayes permit ICNU to submit a brief in excess of 50 pages in the above-captioned dockets. ICNU filed its Opening Brief in this proceeding on November 17, 2006, and ICNU was unaware that the “Tips on PUC Practice and Procedures” posted on the OPUC’s website states that briefs should not exceed fifty pages, unless the ALJ

grants permission otherwise. ICNU's Opening Brief consisted of fifty-eight pages of text and six pages of tables of contents and authorities.

Good cause exists to permit briefs in excess of fifty pages due to the number and complexity of the issues in this proceeding and the volume of evidence in the record. The Commission and the parties will benefit from a thorough discussion of these issues and evidence. In addition, no party will be prejudiced by granting this request, because all parties have the opportunity to submit reply briefs on December 1, 2006.

Dated this 20th day of November, 2006.

Respectfully submitted,

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