

1                                   **BEFORE THE PUBLIC UTILITY COMMISSION**  
2   **OF OREGON**  
3   **UE 180/UE 181/UE 184**

4   In the Matters of

5   PORTLAND GENERAL ELECTRIC  
6   COMPANY

MOTION TO MODIFY BRIEFING SCHEDULE

7   Request for a General Rate Revision (UE 180)

8   Annual Adjustments to Schedule 125 (UE  
9   181)

10   Request for General Rate Revision relating to  
the Port Westward Plant (UE 184).

11           Staff of the Public Utility Commission of Oregon (“staff”) asks the administrative law  
12   judge to modify the post-hearing briefing schedule to allow two additional business days in  
13   which to file both the opening and reply briefs.<sup>1</sup> Because the opening brief is due very shortly,  
14   staff asks for expedited consideration of this request.<sup>2</sup> Counsel for staff has contacted counsel  
15   for Portland General Electric Company, the Industrial Customers of Northwest Utilities, the  
16   Citizens’ Utility Board, and the City of Portland, and none of these parties object to staff’s  
17   proposed modification.

18           Under the current schedule, the opening brief is due Wednesday, November 15, 2006,  
19   and the reply brief is due Friday, December 1, 2006. Staff asks that this schedule be modified so  
20   that the opening brief is due Friday, November 17, 2006, and the reply brief is due Tuesday,  
21   December 5, 2006. The oral argument is currently scheduled for December 12, 2006.  
22   Accordingly, the modified schedule would allow a full week between submission of the reply  
23   briefs and the oral argument.

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25   <sup>1</sup> Staff files this request under OAR 860-013-0031.

26   <sup>2</sup> The administrative law judge is authorized to shorten the time for response to a motion under  
OAR 860-013-0050.

1 Staff asks for the extension because the issues left to be resolved by the Commission are  
2 complex and staff has found that the time originally allotted for briefing has proven to be  
3 inadequate. This is particularly true in light of the fact that staff witnesses are out of the office  
4 and unavailable for consultation during portions of the period allowed for briefing. Furthermore,  
5 both the period for drafting the opening brief and the period for drafting the reply brief include  
6 state holidays, which shortens the time for consultation with staff witnesses.

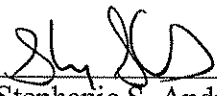
7 **CONCLUSION**

8 For the reasons stated above, staff requests that the administrative law judge modify the  
9 briefing schedule so that the opening brief is due on Friday, November 17, 2006 and the reply  
10 brief is due on Tuesday, December 5, 2006.

11 DATED this 13<sup>th</sup> day of November 2006.

12 Respectfully submitted,

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14 HARDY MYERS  
Attorney General

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17 \_\_\_\_\_  
Stephanie S. Andrus, #92512  
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18 Of Attorneys for Staff of the Public Utility  
Commission of Oregon

1 **CERTIFICATE OF SERVICE**

2  
3 I certify that on November 13, 2006, I served the foregoing Motion to Modify Schedule  
4 upon all parties of record in this proceeding by electronic mail and by mailing a copy by postage  
5 prepaid first class mail or by hand delivery/shuttle mail to the parties accepting paper service.

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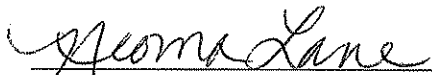
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