

### Portland General Electric Company

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September 7, 2010

## Via Electronic Filing and U.S. Mail

Oregon Public Utility Commission Attention: Filing Center 550 Capitol Street NE, #215 PO Box 2148 Salem OR 97308-2148

### Re: UE 215

Attention Filing Center:

Enclosed for filing in the captioned docket are an original and one copy of:

## • MOTION TO SUSPEND PROCEDURAL SCHEDULE [EXPEDITED CONSIDERATION REQUESTED]

This is being filed by electronic mail with the Filing Center.

An extra copy of the cover letter is enclosed. Please date stamp the extra copy and return to me in the envelope provided. Thank you in advance for your assistance.

Sincerely,

DOUGLAS C. TINGEY Assistant General Counsel

DCT:cbm Enclosures cc: UE 215 Service List

### BEFORE THE PUBLIC UTILITY COMMISSION OF THE STATE OF OREGON UE 215

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In the Matter of

# PORTLAND GENERAL ELECTRIC COMPANY

Request for a General Rate Revision

## MOTION TO SUSPEND PROCEDURAL SCHEDULE

EXPEDITED CONSIDERATION REQUESTED

For the reasons set out below, Portland General Electric Company ("PGE") hereby requests that the remaining procedural schedule in this docket be suspended.

Pursuant to the schedule adopted by the Commission, rebuttal testimony was filed on August 19, 2010, by the City of Portland ("COP"). No other party filed rebuttal testimony. All parties in this docket except the City of Portland have joined in at least one of the six stipulations previously filed.

Settlement discussions between PGE and the COP regarding the issues raised by the COP were held on September 7, 2010. An agreement in principal resolving all issues raised by the COP has been reached between PGE and the COP (collectively the "Stipulating Parties"). The Stipulating Parties are in the process of completing a Stipulation and supporting joint testimony and anticipate filing the Stipulation and testimony by September 16, 2010.

PGE respectfully requests that the remaining procedural schedule in this docket be suspended.<sup>1</sup> PGE has now entered into stipulations with all parties to this docket. Those stipulations and the additional stipulation to be filed between PGE and the COP address all issues raised by the parties in this rate case. PGE therefore believes that the hearing and briefing dates remaining in this docket will not be necessary.

<sup>&</sup>lt;sup>1</sup> The parties are expecting, and PGE intends to file, a load forecast update later this week and power cost updates pursuant to Schedule 125 through early November.

### **CONCLUSION AND EXPEDITED CONSIDERATION REQUEST**

For the reasons discussed above, PGE requests that the administrative law judge issue an order suspending the remaining procedural schedule in this docket, and allow until September 16, 2010, for the stipulation between PGE and the COP, together with supporting joint testimony, to be filed. Since PGE's surrebuttal testimony is due September 9, 2010, expedited consideration of this motion is requested.

DATED this 7<sup>th</sup> day of September, 2010.

Respectfully submitted,

Douglas C. Tingey, OSB No. 044366 Assistant General Counsel Portland General Electric Company 121 SW Salmon Street, 1WTC1301 Portland, Oregon 97204 (503) 464-8926 phone (503) 464-2200 fax doug.tingey@pgn.com

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### **CERTIFICATE OF SERVICE**

I hereby certify that I have this day caused MOTION TO SUSPEND PROCEDURAL

**SCHEDULE [EXPEDITED CONSIDERATION REQUESTED]** to be served by electronic mail to those parties whose email addresses appear on the attached service list and by method specified, postage prepaid and properly addressed, to those parties on the attached service list who have not waived paper service from OPUC Docket No. UE 215.

Dated at Portland, Oregon, this 7<sup>th</sup> day of September, 2010.

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