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August 17, 2011

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
2012 Annual Power Cost Update Tariff (Schedule 125)
Docket No. UE 228

Dear Filing Center:

Enclosed please find the original and one (1) copy of the Joint Motion to Reschedule Hearing of Industrial Customers of Northwest Utilities and Portland General Electric Company on behalf of the Industrial Customers of Northwest Utilities in the above-referenced docket. Thank you for your attention to this matter.

Sincerely yours,

/s/ Sarah A. Kohler
Sarah A. Kohler

Enclosures

cc: Service List

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have this day served the foregoing Joint Motion to Reschedule Hearing of Industrial Customers of Northwest Utilities and Portland General Electric Company on behalf of the Industrial Customers of Northwest Utilities upon the parties, on the service list, by causing the same to be deposited in the U.S. Mail, postage-prepaid, and via electronic mail where paper service has been waived.

Dated at Portland, Oregon, this 17th day of August, 2011.

/s/ Sarah A. Kohler
Sarah A. Kohler

(W) CITIZENS' UTILITY BOARD OF OREGON

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**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UE 228

In the Matter of)	
)	
PORTLAND GENERAL ELECTRIC)	JOINT MOTION TO RESCHEDULE
COMPANY)	HEARING OF THE INDUSTRIAL
)	CUSTOMERS OF NORTHWEST
2012 Annual Power Cost Update Tariff)	UTILITIES AND PORTLAND
(Schedule 125))	GENERAL ELECTRIC
)	
_____)	REQUEST FOR EXPEDITED
)	CONSIDERATION

Pursuant to OAR § 860-001-0580, the Industrial Customers of Northwest Utilities (“ICNU”) and Portland General Electric Company (“PGE”) hereby move the Oregon Public Utility Commission (“Commission”) to postpone the hearing in this proceeding and reschedule the hearing for August 30, 2011. Postponement from the presently scheduled hearing date of August 24, 2011 is justified on two separate bases: 1) the unprecedented volume of rebuttal testimony filed so close to the hearing date in an annual power cost update tariff docket; and 2) PGE’s inadvertent delivery of confidential testimony and workpapers to certain parties after the effective deadline for discovery had passed. ICNU has consulted with counsel for PGE, who has agreed to a postponement until August 30, 2011. In light of the shortness of time remaining in this proceeding, ICNU and PGE request expedited consideration of this motion pursuant to OAR § 860-001-0420(7).

On August 15, 2011, PGE filed 245 pages of rebuttal testimony and exhibits. Based on prior experience in Annual Power Cost Update Tariff proceedings, such volume is

highly unusual. Simply of itself, such volume may not be an issue; however, given that the hearing in this proceeding is scheduled for August 24, 2011, parties have only seven intervening business days in which to review PGE's testimony. A postponement of the hearing six more days until August 30, 2011, would allow all parties more adequate time to analyze the rebuttal testimony and exhibits.

As a secondary basis justifying postponement—and compounding the shortness of the review period just highlighted—PGE inadvertently failed to deliver confidential testimony and workpapers to certain parties until today. ICNU's expert, Don Schoenbeck, was among those who did not receive the confidential versions until today, August 17, 2011. Pursuant to the prehearing conference order, PGE has five business days to respond to discovery requests. Therefore, August 16, 2011 was the last day to request discovery before the hearing. This also means that Mr. Schoenbeck and others received the confidential testimony and exhibits a day *after* the discovery deadline in this docket passed on August 16, 2011. Accordingly, good cause exists to postpone the hearing in order to allow ICNU and other parties the ability to review PGE's filing and to allow for discovery requests and responses before the hearing. ICNU has contacted each party regarding this motion. PGE and Citizens Utility Board support the motion and ICNU is not aware that any party objects.

Along with the request to postpone the hearing, ICNU and PGE request that all remaining dates in the procedural schedule be delayed by six days.

Good cause exists for expedited consideration of this motion due to the time exigencies detailed above.

PAGE 2 – JOINT MOTION TO RESCHEDULE HEARING OF ICNU AND PGE

DAVISON VAN CLEVE, P.C.
333 S.W. Taylor, Suite 400
Portland, OR 97204
Telephone: (503) 241-7242

WHEREFORE, ICNU respectfully requests that the Commission grant its motion with expedited consideration.

Dated this 17th day of August, 2011.

Respectfully submitted,

DAVISON VAN CLEVE, P.C

/s/ S. Bradley Van Cleve

S. Bradley Van Cleve

Irion A. Sanger

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Of Attorneys for the Industrial Customers of
Northwest Utilities

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