

#### **Portland General Electric Company**

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September 16, 2013

#### Via Electronic Filing and U.S. Mail

Oregon Public Utility Commission Attention: Filing Center PO Box 1088 Salem, OR 97308-2148

Re: UE 262

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:jrb Enclosures cc: UE 262 Service List

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

#### **UE 262**

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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.

Two Stipulations have been filed in this docket that together settled all issues except PGE's pension-related costs. On August 6, 2013, Staff of the Public Utility Commission ("Staff"), the Citizens' Utility Board ("CUB"), and the Industrial Customers of Northwest Utilities ("ICNU"), filed rebuttal testimony addressing only test-year pension costs. PGE filed surrebuttal testimony on August 28, 2013. No other party filed testimony regarding pension costs.

Settlement discussions between PGE, Staff, CUB and ICNU (collectively the "Stipulating Parties") were held on August 16, 2013, and continued on September 5, 2013. As a result of those discussions, an agreement in principal resolving the one remaining issue of test-year pension costs was reached among 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 later this week.

PGE respectfully requests that the remaining procedural schedule in this docket be suspended.<sup>1</sup> With this third stipulation to be filed shortly, PGE will have entered into

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

stipulations that resolve 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.

#### **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. Pursuant to the schedule set in this docket, cross-examination statements and each party's prehearing memorandum are due tomorrow. Accordingly, expedited consideration of this motion is requested.

DATED this 16<sup>th</sup> day of September, 2013.

Respectfully submitted,

Douglas C. Tingey, OSB No. 044366 Associate 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 served Portland General Electric's **Motion to Suspend Procedural Schedule,** by electronic mail to those parties whose email addresses appear on the attached service list for OPUC Docket No. UE 262.

DATED at Portland, Oregon, this 16<sup>th</sup> day of September, 2013.

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