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BEFORE THE OREGON PUBLIC UTILITIES COMMISSION

DR 10/UE 88/UM 989

In the Matters of

The Application of Portland General Electric Company for an Investigation into Least Cost Plan Plant Retirement. (DR 10)

Revised Tariffs Schedules for Electric Service in Oregon Filed by Portland General Electric Company. (UE 88)

Portland General Electric Company's Application for an Accounting Order and for Order Approving Tariff Sheets Implementing Rate Reduction. (UM 989) MOTION FOR 3-DAY EXTENSION OF TIME TO FILE URP SURREBUTTAL TESTIMONY

URP requests a 3-day extension of time for the filing of its surrebuttal testimony, taking the date from July 25 to July 28, 2005.

This extension is warranted for several reasons. First, the ALJ has yet to rule on the PGE Motion to Strike, filed on June 14, 2005. Without knowing which elements of its opening testimony may be stricken, it is not possible for URP to prepare the correct surrebuttal testimony.

Second, after the schedule in this case was set by ALJ order of May 2, 2005, PGE obtained an extension of time from the Oregon Supreme Court in *Dreyer, et al. v. Portland General Electric Company (PGE)*, Supreme Court No. S 52284, pursuant to which that Court has accepted and is considering the merits of PGE's petition for alternative writ of mandamus to halt the class action lawsuits underway

in Marion County Circuit Court to recover the unlawful charges to PGE ratepayers for Trojan return on investment during the same 5.5-year period that is the subject of this phase of this proceeding. PGE's extension of time compelled undersigned counsel to seek an extension of time for replying to that memorandum until July 26, 2005. Thus, undersigned counsel is overwhelmingly engaged in preparing a memorandum for the Oregon Supreme Court proceeding that may cause much of all of this phase of this proceeding to be moot.

Granting this motion will not cause prejudice to PGE, as PGE will continue to have 20 days until the date for filing of its surrebuttal testimony. Further, URP would not object to a similar extension of that deadline.

Undersigned counsel provided a draft of this motion to counsel for PGE, Jay Dudley, very late on July 22. Nevertheless, PGE counsel responded that PGE does not object to this request.

Dated: July 22, 2005 Respectfully Submitted,

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CERTIFICATE OF SERVICE

I hereby certify that I served a true copy of the foregoing MOTION FOR 3-DAY EXTENSION OF TIME TO FILE URP SURREBUTTAL TESTIMONY BY UTILITY REFORM PROJECT by email to the email addresses shown below, which comprise the service list on the Commission's web site as of this day.

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Dated: July 22, 2005	
	Daniel W. Meek