

1 BEFORE THE PUBLIC UTILITY COMMISSION  
2 OF OREGON  
3

4 In the Matter of PORTLAND GENERAL  
5 ELECTRIC COMPANY Application for an  
6 Order Authorizing the Issuance of 62,500,000  
7 Shares of New Common Stock Pursuant to  
8 ORS 757.410 *et seq.*

Case Nos. UF 4218/UM 1206

and

JOINT MOTION BY CITY OF  
PORTLAND AND APPLICANTS TO  
EXTEND TIME FOR FILING CITY'S  
DIRECT TESTIMONY

9 In the Matter of STEPHEN FORBES  
10 COOPER, LLC, as Disbursing Agent, on  
11 behalf of the RESERVE FOR DISPUTED  
12 CLAIMS Application for an Order Allowing  
13 the Reserve for Disputed Claims to Acquire  
14 the Power to Exercise Substantial Influence  
15 over the Affairs and Policies of Portland  
16 General Electric Company Pursuant to ORS  
17 757.511

15 The City of Portland and Applicants hereby request an extension of time for the City to  
16 file its direct testimony in this case. Testimony is currently due on September 9, 2005. The City  
17 and PGE request that the City be permitted to file its testimony on September 16, 2005.

18 As grounds for this motion, the City and Applicants state as follows:

19 The City has submitted data requests to PGE. Responses were due to the City on August  
20 26. At the same time, Applicants and the City and other parties have been engaged in settlement  
21 negotiations. The City has now advised the parties that it will not join the settlement that is  
22 currently under consideration.


23 PGE is unable to respond to the City's data requests until September 2, 2005. The City  
24 has agreed that PGE may have until that day to provide the information sought, conditioned on  
25 the City itself receiving a similar extension of time, until September 16, to file its direct  
26 testimony. Applicants support the City request for an extension of time, so that the City is not

1 prejudiced by PGE's delay in responding to the data requests.

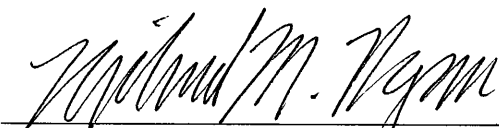
2 The City and Applicants respectfully request that the City be permitted to file its direct  
3 testimony on September 16, 2005.

4 Dated this 29th day of August, 2005.

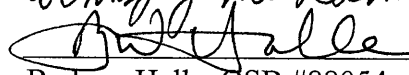
5 Respectfully submitted,

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8 Benjamin Walters, OSB #85354  
9 Senior Deputy City Attorney  
10 Of Attorneys for City of Portland

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12 Michael Morgan, OSB #72173  
13 Tonkon Torp LLP  
14 Of Attorneys for Applicant Stephen Forbes  
15 Cooper, LLC *as Disbursing Agent - on*  
16 *behalf of the Respective Disputed Claims*

17 

18 Barbara Halle, OSB #88054  
19 Portland General Electric Company  
20 Of Attorneys for Applicant Portland General  
21 Electric

1 CERTIFICATE OF SERVICE

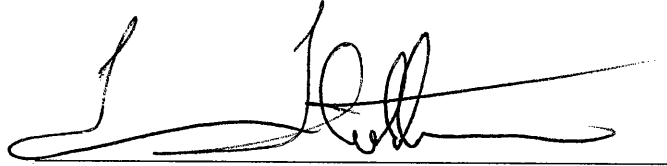
2 I hereby certify that I served a copy of the foregoing JOINT MOTION FOR EXTENSION  
3 OF TIME TO FILE DIRECT TESTIMONY to:

4 PUC ADMINISTRATIVE HEARINGS DIVISION  
5 550 CAPITOL STREET, NE, SUITE 215  
6 SALEM OREGON 97310-2551  
7 Fax No. (503) 378-6163

8 on the 29th day of August 29, 2005, by electronic copy to Case Manager, Bryan Conway, e-mail  
9 address: [bryan.conway@state.or.us](mailto:bryan.conway@state.or.us) and by mailing the original and five copies of said  
10 document, contained in a sealed envelope with postage paid, and deposited in the post office at  
11 Portland, Oregon on said day.

12 I further certify that I served a copy of the foregoing MOTION on the following Persons  
13 by electronically mailing copies to the individuals on the attached Service List.

14 DATED this 29<sup>TH</sup> day of August, 2005.

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16 Terence Thatcher, OSB #84122  
17 Deputy City Attorney  
18 Of Attorneys for City of Portland  
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**SERVICE LIST (UF 4218/UM 1206)**

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