

November 15, 2005

Via Electronic Filing and U.S. Mail

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

Re: In the Matter of PORTLAND GENERAL ELECTRIC
Application for Authority to Issue Common Stock
OPUC Docket Nos. UF 4218/UM 1206

Attention Filing Center:

Enclosed for filing in the above-captioned dockets is Portland General Electric Company's Motion to Supplement Information Provided Pursuant to OAR 860-027-0030 and Motion to Reduce the Time to Respond to This Motion.

An extra copy of this cover letter is enclosed. Please date stamp the extra copy and return it to me in the envelope provided.

Thank you in advance for your assistance.

Sincerely,

/s/ J. JEFFREY DUDLEY

JJD:am
Enclosures

cc: UF 4218 and UM 1206 Service Lists

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UF 4218 / UM 1206

In the Matter of the Application of PORTLAND GENERAL ELECTRIC COMPANY for an Order Authorizing the Issuance of 62,500,000 Shares of New Common Stock Pursuant to ORS 757.410 et seq. **UF 4218**

and

In the Matter of the Application of STEPHEN FORBES COOPER, LLC, as Disbursing Agent, on behalf of the RESERVE FOR DISPUTED CLAIMS, for an Order Allowing the Reserve for Disputed Claims to Acquire the Power to Exercise Substantial Influence over the Affairs and Policies of Portland General Electric Company Pursuant to ORS 757.511 **UM 1206**

PORTLAND GENERAL ELECTRIC COMPANY'S MOTION TO SUPPLEMENT INFORMATION PROVIDED PURSUANT TO OAR 860-027-0030 AND MOTION TO REDUCE THE TIME TO RESPOND TO THIS MOTION

Pursuant to OAR 860-013-0031, Portland General Electric Company (“PGE”) hereby moves to supplement the information it provided in Appendix A to the Application for an Order Authorizing the Issuance of New Common Stock and for an Order under ORS 757.511, filed on behalf of PGE and Stephen Forbes Cooper, LLC, as Disbursing Agent, on behalf of the Reserve for Disputed Claims (the “Application”).

As part of the Application, PGE provided information in Appendix A pursuant to OAR 860-027-0030 in connection with its request to issue common stock (the “New PGE Common Stock”). In response to OAR 860-027-0030(2)(E), (G), and (H), PGE provided its balance sheet as of March 31, 2005, comparative income statement for the three-month period ending March 31, 2005, and its surplus for the three-month period ending March 31, 2005.

Appendix A at 8, and Exhibits E, G and H to Appendix A. For Exhibits E and G, PGE stated that this financial information did not include adjustments to record the proposed issuance of

New PGE Common Stock because that information was not available at the time. PGE stated that it would provide this information when it became available.

The updated financial information making such adjustments to Exhibits E, G and H of Appendix A is now available and attached to this Motion (Ex. 1 (updated Exhibit E), Ex. 2 (updated Exhibit G), and Ex. 3 (updated Exhibit H), collectively, the “Supplemental Information”). PGE requests that its response to OAR 860-027-0030 be supplemented with the updated Exhibits E, G and H attached hereto.

Permitting the submission of the Supplemental Information will not cause delay or burden other parties. On September 2, 2005, PGE provided copies of updated Exhibits E, G and H to the City of Portland. Ex. 4. On September 20, 2005, PGE provided copies of the same updates to Utility Reform Project (“URP”). Ex. 5. Accordingly, the only two parties to oppose the Application had the Supplemental Information well before the record was closed on October 13. In order to facilitate a timely review of the Application, PGE asks that the time to respond to this Motion to Supplement be reduced to require oppositions, if any, to be filed by November 22, 2005. Shortening the time for response should not burden other parties given that PGE provided the Supplemental Information to the City of Portland and URP over two months ago.

For the reasons stated above, PGE respectfully requests that the Commission or the Administrative Law Judge issue an order or ruling: (i) shortening the time to respond to PGE's Motion to Supplement; and (ii) allowing PGE's submission of the Supplemental Information.

Respectfully submitted this 15th day of November, 2005.

/s/ J. JEFFREY DUDLEY

J. Jeffrey Dudley, OSB # 89042

Associate General Counsel

Barbara W. Halle, OSB # 88054

Assistant General Counsel

Portland General Electric Company

121 SW Salmon, 1WTC13

Portland, OR 97204

(503) 464-7717 telephone

(503) 464-2200 facsimile

CERTIFICATE OF SERVICE

I hereby certify that I served the foregoing **PORTLAND GENERAL ELECTRIC COMPANY'S MOTION TO SUPPLEMENT INFORMATION PROVIDED PURSUANT TO OAR 860-027-0030 AND MOTION TO REDUCE THE TIME TO RESPOND TO THIS MOTION** by electronic mail where available to each party listed and by mailing a copy thereof in a sealed envelope, first-class postage prepaid, addressed to the parties on the attached official service list in OPUC Docket Nos. UF 4218 and UM 1206, deposited in the U.S. Mail at Portland, Oregon.

Dated this 15th day of November, 2005.

/s/ J. JEFFREY DUDLEY

J. Jeffrey Dudley

SERVICE LIST

<p>JIM ABRAHAMSON COMMUNITY ACTION DIRECTORS OF OREGON P.O. BOX 7964 SALEM OR 97303-0208 jim@cado-oregon.org</p>	<p>SUSAN ANDERSON CITY OF PORTLAND OFFICE OF SUSTAINABLE DEV 721 NW 9TH AVE -- SUITE 350 PORTLAND OR 97209-3447 susananderson@ci.portland.or.us</p>
<p>JULIE BATES BONNEVILLE POWER ADMINISTRATION 905 NE 11TH AVE PORTLAND OR 97208 jabatx'es@bpa.gov</p>	<p>KEN BEESON EUGENE WATER & ELECTRIC BOARD 500 EAST FOURTH AVENUE EUGENE OR 97440-2148 ken.beeson@eweb.eugene.or.us</p>
<p>LOWREY R BROWN -- CONFIDENTIAL CITIZENS' UTILITY BOARD OF OREGON 610 SW BROADWAY, SUITE 308 PORTLAND OR 97205 lowrey@oregoncub.org</p>	<p>J LAURENCE CABLE CABLE HUSTON BENEDICT ET AL 1001 SW 5TH AVE STE 2000 PORTLAND OR 97204-1136 lcable@chbh.com</p>
<p>BRYAN CONWAY PO BOX 2148 SALEM OR 97309-2148 bryan.conway@state.or.us</p>	<p>JOAN COTE OREGON ENERGY COORDINATORS ASSOCIATION 2585 STATE ST NE SALEM OR 97301 cotej@mwvcaa.org</p>
<p>MELINDA J DAVISON DAVISON VAN CLEVE PC 333 SW TAYLOR, STE. 400 PORTLAND OR 97204 mail@dvclaw.com</p>	<p>J JEFFREY DUDLEY PORTLAND GENERAL ELECTRIC 121 SW SALMON ST 1WTC1300 PORTLAND OR 97204 jay.dudley@pgn.com</p>
<p>JASON EISDORFER -- CONFIDENTIAL CITIZENS' UTILITY BOARD OF OREGON 610 SW BROADWAY STE 308 PORTLAND OR 97205 jason@oregoncub.org</p>	<p>JAMES F FELL STOEL RIVES LLP 900 SW 5TH AVE STE 2600 PORTLAND OR 97204-1268 jffell@stoel.com</p>
<p>ANN L FISHER AF LEGAL & CONSULTING SERVICES 2005 SW 71ST AVE PORTLAND OR 97225-3705 energlaw@aol.com</p>	<p>ANDREA FOGUE LEAGUE OF OREGON CITIES PO BOX 928 1201 COURT ST NE STE 200 SALEM OR 97308 afogue@orcities.org</p>
<p>DAVID E HAMILTON NORRIS & STEVENS 621 SW MORRISON ST STE 800 PORTLAND OR 97205-3825 davidh@norrstev.com</p>	<p>DAVID KOOGLER -- CONFIDENTIAL ENRON CORPORATION PO BOX 1188 HOUSTON TX 77251-1188 david.koogler@enron.com</p>
<p>GEOFFREY M KRONICK LC7 BONNEVILLE POWER ADMINISTRATION PO BOX 3621 PORTLAND OR 97208-3621 gmkronick@bpa.gov</p>	<p>GORDON MCDONALD PACIFIC POWER & LIGHT 825 NE MULTNOMAH STE 800 PORTLAND OR 97232 gordon.mcdonald@pacificcorp.com</p>

<p>DANIEL W MEEK -- CONFIDENTIAL DANIEL W MEEK ATTORNEY AT LAW 10949 SW 4TH AVE PORTLAND OR 97219 dan@meek.net</p>	<p>CHRISTY MONSON LEAGUE OF OREGON CITIES 1201 COURT ST. NE STE. 200 SALEM OR 97301 cmonson@orcities.org</p>
<p>MICHAEL M MORGAN -- CONFIDENTIAL TONKON TORP LLP 888 SW 5TH AVE STE 1600 PORTLAND OR 97204-2099 mike@tonkon.com</p>	<p>TIMOTHY V RAMIS RAMIS CREW CORRIGAN LLP 1727 NW HOYT STREET PORTLAND OR 97239 timr@rcclawyers.com</p>
<p>PGE-OPUC FILINGS RATES & REGULATORY AFFAIRS PORTLAND GENERAL ELECTRIC COMPANY 121 SW SALMON STREET, 1WTC0702 PORTLAND OR 97204 pge.opuc.filings@pgn.com</p>	<p>LAWRENCE REICHMAN PERKINS COIE LLP 1120 NW COUCH ST - 10 FL PORTLAND OR 97209-4128 lreichman@perkinscoie.com</p>
<p>CRAIG SMITH BONNEVILLE POWER ADMINISTRATION PO BOX 3621--L7 PORTLAND OR 97208-3621 cmsmith@bpa.gov</p>	<p>MITCHELL TAYLOR -- CONFIDENTIAL ENRON CORPORATION PO BOX 1188 HOUSTON TX 77251-1188 mitchell.taylor@enron.com</p>
<p>RANDALL C TOSH CITY OF SALEM 555 LIBERTY STREET SE, ROOM 205 SALEM OR 97301 rtosh@cityofsalem.net</p>	<p>BENJAMIN WALTERS -- CONFIDENTIAL CITY OF PORTAND - OFFICE OF CITY ATTORNEY 1221 SW 4TH AVE - RM 430 PORTLAND OR 97204 bwalters@ci.portland.or.us</p>
<p>MICHAEL T WEIRICH -- CONFIDENTIAL DEPARTMENT OF JUSTICE REGULATED UTILITY & BUSINESS SECTION 1162 COURT ST NE SALEM OR 97301-4096 michael.weirich@state.or.us</p>	<p>KEN WORCESTER CITY OF WEST LINN 22500 SALAMO RD WEST LINN OR 97068 kworcester@ci.west-linn.or.us</p>

Exhibit "E"

Portland General Electric Company and Subsidiaries
Consolidated Balance Sheet
(Unaudited)
For the Three Months Ended March 31, 2005
(Millions of Dollars)

	March 31, 2005	Adjustments (1)	Adjusted Total
Assets			
Electric Utility Plant - Original Cost			
Utility plant (includes construction work in progress of \$142 and \$114)	4,043	(0)	4,043
Accumulated depreciation	<u>(1,734)</u>	0	<u>(1,734)</u>
	2,309		2,309
Other Property and Investments			
Nuclear decommissioning trust, at market value	21		21
Non-qualified benefit plan trust	62		62
Miscellaneous	<u>31</u>		<u>31</u>
	114		114
Current Assets			
Cash and cash equivalents	316		316
Accounts and notes receivable (less allowance for uncollectible accounts of \$50 and \$50)	187		187
Unbilled revenues	57		57
Assets from price risk management activities	213		213
Inventories, at average cost	46		46
Prepayments and other	<u>116</u>		<u>116</u>
	935		935
Deferred Charges			
Regulatory assets	281		281
Miscellaneous	<u>24</u>		<u>24</u>
	305		305
	<u>3,663</u>		<u>3,663</u>
Capitalization and Liabilities			
Capitalization			
Common stock, \$3.75 par value per share, 100,000,000 shares authorized; 42,758,877 shares outstanding	160	(160)	-
Common stock, no par value per share, 80,000,000 shares authorized; 62,500,000 shares outstanding		641	641
Other paid-in capital - net	481	(481)	-
Retained earnings	675		675
Accumulated other comprehensive income (loss):			
Unrealized gain on derivatives classified as cash flow hedges	4		4
Minimum pension liability adjustment	(4)		(4)
Limited voting junior preferred stock			
Long-term obligations	<u>889</u>		<u>889</u>
	2,205		2,205
Commitments and Contingencies (see Notes)			
Current Liabilities			
Long-term debt due within one year	30		30
Accounts payable and other accruals	193		193
Liabilities from price risk management activities	83		83
Customer deposits	68		68
Accrued interest	15		15
Accrued taxes	67		67
Deferred income taxes	<u>51</u>		<u>51</u>
	507		507
Other			
Deferred income taxes	259		259
Deferred investment tax credits	12		12
Trojan asset retirement obligation	104		104
Accumulated asset retirement obligation	16		16
Regulatory liabilities			
Accumulated asset retirement removal costs	309		309
Other unamortized regulatory liabilities	139		139
Non-qualified benefit plan liabilities	71		71
Miscellaneous	<u>41</u>		<u>41</u>
	951		951
	<u>3,663</u>		<u>3,663</u>

(1) Adjusting entries are preliminary and subject to audit.

Exhibit E

Not including costs associated with issuance which would be charged to expense as incurred.

Exhibit 1

Exhibit "G"

Portland General Electric Company and Subsidiaries
 Consolidated Statement of Income
 (Unaudited)
 For the Three Months Ended March 31, 2005
 (Millions of Dollars)

	<u>March 31, 2005</u>	Adjustments (In Millions)	<u>Adjusted Total</u>
Operating Revenues	\$371		\$371
Operating Expenses			
Purchased power and fuel	142		142
Production and distribution	28		28
Administrative and other	38		38
Depreciation and amortization	60		60
Taxes other than income taxes	20		20
Income taxes	30		30
	<u>318</u>		<u>318</u>
Net Operating Income	<u>\$53</u>		<u>\$53</u>
Other Income (Deductions)			
Miscellaneous	2		2
Income taxes	1		1
	<u>\$3</u>		<u>\$3</u>
Interest Charges			
Interest on long-term debt and other	<u>\$18</u>		<u>\$18</u>
Net income before cumulative effect of a change in accounting principle	\$64		\$64
Cumulative effect of a change in accounting principle, net of related taxes of \$(1)	<u>0</u>		<u>0</u>
Net Income (Loss)	\$64		\$64
Preferred Dividend Requirement	<u>0</u>		<u>0</u>
Income (Loss) Available for Common Stock	<u><u>\$64</u></u>		<u><u>\$64</u></u>

Not including costs associated with issuance which would be charged to expense as incurred

Exhibit "H"

Portland General Electric Company and Subsidiaries
 Consolidated Statement of Retained Earnings
 (Unaudited)
 For the Three Months Ended March 31, 2005
 (Millions of Dollars)

	<u>March 31, 2005</u>	Adjustments (In Millions)	<u>Adjusted Total</u>
Balance at Beginning of Period	\$637		\$637
Net Income (Loss)	<u>38</u>		<u>38</u>
	675		675
Dividends Declared			
Preferred stock	<u>0</u>		<u>0</u>
Balance at End of Period	<u><u>\$675</u></u>		<u><u>\$675</u></u>

Exhibit H

Not including costs associated with issuance which would be charged to expense as incurred

Exhibit 3

September 2, 2005

TO: Benjamin Walters
City of Portland

FROM: Patrick Hager
Manager, Regulatory Affairs

**PORTLAND GENERAL ELECTRIC
UF-4218/UM-1206
PGE Response to City of Portland Data Request
Dated August 11, 2005
Question 017**

Request:

Please provide copies of Exhibits G and H (Application, Appendix A) showing comparative income statements and statements of retained earnings before and after the proposed issuance of New PGE Common Stock. At the time the Application was filed, PGE stated that the adjustments to record the proposed issuance of New PGE Common Stock and pro forma were not then currently available. Please provide the required information or state when the information will be available.

Response:

Attachment 017-A provides the requested draft Exhibits. The adjusting entries are preliminary and subject to review by PGE's auditors, Deloitte and Touche. We expect that review to be completed in approximately one month. At the time of completion, PGE will file updated Exhibits E, G, and H to the application.

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Attachment 017-A

Draft Exhibits E, G, and H

Exhibit "E"

Portland General Electric Company and Subsidiaries
 Consolidated Balance Sheet
 (Unaudited)
 For the Three Months Ended March 31, 2005
 (Millions of Dollars)

	March 31, 2005	Adjustments (1)	Adjusted Total
Assets			
Electric Utility Plant - Original Cost			
Utility plant (includes construction work in progress of \$142 and \$114)	4,043	(0)	4,043
Accumulated depreciation	(1,734)	0	(1,734)
	<u>2,309</u>	-	<u>2,309</u>
Other Property and Investments			
Nuclear decommissioning trust, at market value	21		21
Non-qualified benefit plan trust	62		62
Miscellaneous	31		31
	<u>114</u>		<u>114</u>
Current Assets			
Cash and cash equivalents	316		316
Accounts and notes receivable (less allowance for uncollectible accounts of \$50 and \$50)	187		187
Unbilled revenues	57		57
Assets from price risk management activities	213		213
Inventories, at average cost	46		46
Prepayments and other	116		116
	<u>935</u>		<u>935</u>
Deferred Charges			
Regulatory assets	281		281
Miscellaneous	24		24
	<u>305</u>		<u>305</u>
	<u>3,663</u>		<u>3,663</u>
Capitalization and Liabilities			
Capitalization			
Common stock, \$3.75 par value per share, 100,000,000 shares authorized, 42,758,677 shares outstanding	160	(160)	-
Common stock, no par value per share, 80,000,000 shares authorized, 62,500,000 shares outstanding		641	641
Other paid-in capital - net	481	(481)	-
Retained earnings	675		675
Accumulated other comprehensive income (loss):			
Unrealized gain on derivatives classified as cash flow hedges	4		4
Minimum pension liability adjustment	(4)		(4)
Limited voting junior preferred stock			
Long-term obligations	889		889
	<u>2,205</u>		<u>2,205</u>
Commitments and Contingencies (see Notes)			
Current Liabilities			
Long-term debt due within one year	30		30
Accounts payable and other accruals	193		193
Liabilities from price risk management activities	83		83
Customer deposits	68		68
Accrued interest	15		15
Accrued taxes	67		67
Deferred income taxes	51		51
	<u>507</u>		<u>507</u>
Other			
Deferred income taxes	259		259
Deferred investment tax credits	12		12
Trojan asset retirement obligation	104		104
Accumulated asset retirement obligation	16		16
Regulatory liabilities:			
Accumulated asset retirement removal costs	309		309
Other, unamortized regulatory liabilities	139		139
Non-qualified benefit plan liabilities	71		71
Miscellaneous	41		41
	<u>951</u>		<u>951</u>
	<u>3,663</u>		<u>3,663</u>

(1) Adjusting entries are preliminary and subject to audit.

Exhibit E

DRAFT

Exhibit "G"

Portland General Electric Company and Subsidiaries
 Consolidated Statement of Income
 (Unaudited)
 For the Three Months Ended March 31, 2005
 (Millions of Dollars)

	March 31, 2005	Adjustments (1) (In Millions)	Adjusted Total
Operating Revenues	\$371		\$371
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Purchased power and fuel	142		142
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Administrative and other	38		38
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Taxes other than income taxes	20		20
Income taxes	30		30
	318		318
Net Operating Income	\$53		\$53
Other Income (Deductions)			
Miscellaneous	2		2
Income taxes	1		1
	\$3		\$3
Interest Charges			
Interest on long-term debt and other	\$18		\$18
Net income before cumulative effect of a change in accounting principle	\$64		\$64
Cumulative effect of a change in accounting principle, net of related taxes of \$(1)	0		0
Net Income (Loss)	\$64		\$64
Preferred Dividend Requirement	0		0
Income (Loss) Available for Common Stock	\$64		\$64

(1) No preliminary adjusting entries to the income statement (subject to audit).

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Exhibit 4
Page 4 of 5

Exhibit "H"

Portland General Electric Company and Subsidiaries
 Consolidated Statement of Retained Earnings
 (Unaudited)
 For the Three Months Ended March 31, 2005
 (Millions of Dollars)

	<u>March 31, 2005</u>	Adjustments (1) (In Millions)	<u>Adjusted Total</u>
Balance at Beginning of Period	\$637		\$637
Net Income (Loss)	<u>38</u>		<u>38</u>
	675		675
Dividends Declared			
Preferred stock	<u>0</u>		<u>0</u>
Balance at End of Period	<u><u>\$675</u></u>		<u><u>\$675</u></u>

(1) No preliminary adjusting entries to the statement of retained earnings (subject to audit)..

Exhibit H

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Exhibit 4
 Page 5 of 5



Portland General Electric Company
121 SW Salmon Street • Portland, Oregon 97204

September 20, 2005

MESSENGER

Dan Meek
Utility Reform Project
10949 SW Fourth Avenue
Portland, OR 97219

RE: UF-4218/UM-1206

Enclosed please find PGE Responses to URP Data Request Nos.001 and 002, dated September 8, 2005.

Attachment 001-A, City of Portland Data Request Nos. 18 and 24 are confidential, subject to Protective Order No. 05-971 and are provided under separate cover.

If you have any questions, please contact me at (503) 464-7580. Please direct all formal correspondence and requests to the following email address pge.opuc.filings@pgn.com

Sincerely,

Patrick G. Hager
Manager, Regulatory Affairs

encls.

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September 20, 2005

TO: Dan Meek
Utility Reform Project

FROM: Patrick Hager
Manager, Regulatory Affairs

**PORTLAND GENERAL ELECTRIC
UF-4218/UM-1206
PGE Response to URP Data Request
Dated September 8, 2005
Question 001**

Request:

Please provide your responses to the following information requests (including the subparts of each identified request) from the City of Portland: 1, 2, 3, 5, 7, 8, 9, 11, 12, 13, 14, 16, 17, 18, 20, 21, 22, 23, 24, 25, 26, 27, 28, 41, 42, 43, 45, 46.

Response:

Responses to the following information requests (including the subparts of each identified request) from the City of Portland: 1, 2, 3, 5, 7, 8, 9, 11, 12, 13, 14, 16, 17, 18, 20, 21, 22, 23, 24, 25, 26, 27, 28, 41, 42, 43, 45, 46 are included as Attachment 001-A. Number 18 and 24 are confidential and subject to the Protective Order in this docket (OPUC Order No. 05-971) and are provided under separate cover.

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