

1 **BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON**

2  
3 **UM 1226**

4  
5 **UTILITY REFORM PROJECT and**  
6 **KEN LEWIS,**

7  
8 **Complainants/Applicants,**

9  
10 **v.**

11  
12 **PORTLAND GENERAL ELECTRIC CO.,**

13  
14 **Defendant.**

**COMPLAINANTS' MOTION FOR  
EXTENSION OF TIME TO FILE  
"RESPONSE TO PGE MOTION  
TO DISMISS, ABATE, OR MAKE  
MORE DEFINITE AND CERTAIN"**

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16  
17 PGE filed its Motion to Dismiss, Abate, or Make More Definite and Certain  
18 [hereinafter "PGE Motion"] on November 10, 2005. Undersigned counsel has no  
19 record of receiving the electronic version and only recently happened upon the hard  
20 copy, behind a filing cabinet.

21 Undersigned counsel contacted PGE counsel by email on November 29, and  
22 Mr. Tingey expressed no objection to an extension of the time to respond to PGE's  
23 motion to December 2. As preparation of the response was underway on  
24 December 2, however, the PGE system experienced an outage that completely cut  
25 off power to my office for several hours, thus making it not possible for me to  
26 complete, file, and serve the response.

27 Thus, Complainants request until today, December 5, 2005, to file and serve

1 the above-captioned response.

2 Dated: December 5, 2005

Respectfully Submitted,

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DANIEL W. MEEK  
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Attorney for  
Complainants/Applicants

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**CERTIFICATE OF SERVICE**

I hereby certify that I filed served for foregoing COMPLAINANTS' MOTION FOR EXTENSION OF TIME TO FILE "RESPONSE TO PGE MOTION TO DISMISS, ABATE, OR MAKE MORE DEFINITE AND CERTAIN" by email to the list below and by depositing a true copy in the U.S. Mail, first class postage prepaid, a true and correct copy upon the addresses below.

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jay.dudley@pgn.com  
linda@lindawilliams.net

Douglas Tingey  
Office of Legal Counsel  
121 SW Salmon, 1WTC1300  
Portland, OR 97204

20 Dated: December 5, 2005

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Daniel W. Meek