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November 30, 2005

VIA E-FILING & FIRST CLASS MAIL

Oregon Public Utility Commission
Attn: Filing Center
550 Capitol St. NE, Suite 215
P. O. Box 2148
Salem, Oregon 97308-2148

Re: *UE 88/DR 10/UM 989*

Attention Filing Center:

Enclosed for filing in the above-referenced docket are the original and five copies of Portland General Electric Company's Post Hearing Reply Brief (Phase I). This document is being filed electronically per the Commission's eFiling policy to the electronic address PUC.FilingCenter@state.or.us, with copies being served on all parties on the service list via U.S. Mail. A photocopy of the PUC tracking information will be forwarded with the hard copy filing.

Very truly yours,

A handwritten signature in black ink that reads 'D. White' in a cursive style.

David F. White

DFW/ldh
Enclosures
cc: Service List
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**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

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)

**PORTLAND GENERAL ELECTRIC
COMPANY'S POST-HEARING
REPLY BRIEF (PHASE I)**

Pursuant to the Administrative Law Judge's Rulings on September 19 and October 10, 2005, Portland General Electric Company ("PGE") submits this Reply Brief. The ALJ's Rulings established three rounds of briefs: simultaneous opening and reply briefs for all parties and a final response brief to be filed by PGE alone. ALJ Ruling, dated September 19, 2005, at 7. Because the opening briefs focused on topics (1) addressed in testimony, (2) covered in briefs regarding the scope of this docket, and (3) anticipated in each other's opening briefs, PGE elects not to file a substantive reply brief and will submit its substantive response in PGE's Response Brief, due on December 14, 2005. This will not cause any prejudice to other parties as the reply brief is the final opportunity for briefing other than PGE's Response Brief. Moreover, we believe that two, rather than three,

substantive briefs from PGE will provide the Commission with a focused, streamlined and complete basis for its consideration of the issues in Phase I of this docket.

DATED this 30th day of November, 2005.

PORTLAND GENERAL ELECTRIC
COMPANY

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Of Attorneys for Portland General Electric
Company

001991\00226\662418 V001

CERTIFICATE OF SERVICE

I hereby certify that on this day I served the foregoing **PORTLAND GENERAL ELECTRIC COMPANY'S REPLY BRIEF** by mailing a copy thereof in a sealed, first-class postage prepaid envelope, addressed to each party listed below and depositing in the U.S. mail at Portland, Oregon.

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DATED this 30th day of November, 2005.

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By _____
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