

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**UE 228**

|                                      |   |                                  |
|--------------------------------------|---|----------------------------------|
| In the Matter of                     | ) |                                  |
|                                      | ) | CITIZENS' UTILITY BOARD          |
| PORTLAND GENERAL ELECTRIC            | ) | OF OREGON'S RESPONSE TO PGE      |
| COMPANY'S                            | ) | MOTION TO CORRECT HEARING        |
|                                      | ) | TRANSCRIPT DATED AUGUST 30, 2011 |
| 2012 Annual Power Cost Update Tariff | ) |                                  |
| (Schedule 125)                       | ) |                                  |
| <hr/>                                |   | )                                |

**Introduction.**

CUB writes, pursuant to OAR 860-001-0420(5), in response to PGE's Motion to Correct Hearing Transcript Dated August 30, 2011. CUB not only objects but strenuously objects to PGE's request to "correct" the hearing transcript. CUB's objections are based on the fact that there is no audio recording of this hearing<sup>1</sup> against which to check PGE's requests, no precedent for such an action, and PGE's requests are not limited to scrivener error requests but are intended to change the substance of the record. We all make mistakes when talking but the record is the final evidence in this docket.

**Argument.**

- A. CUB finds PGE's requests to be extremely suspect because they seek to "correct" more than scrivener error.***

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<sup>1</sup> Exhibit 2 at page 2 – email from Lisa Kaner dated September 14, 2011.  
UE 228- CITIZENS' UTILITY BOARD OF OREGON'S RESPONSE TO PGE MOTION TO CORRECT HEARING TRANSCRIPT DATED AUGUST 30, 2011

CUB finds PGE's requests to be extremely suspect for the following reasons.

1. While the list provided in the filed PGE motion is whittled down from the initial list provided to CUB for review, the list is still an attempt to change the content of the record after the hearing has ended.
2. PGE's witnesses were under oath when they made their statements but that is no longer the case. While PGE's witnesses may have intended to make the statements PGE is attempting to include, the fact remains that the PGE witnesses apparently did not make those statements during their sworn testimony and PGE should not now be permitted to "correct" its witnesses' testimony.
3. Counsel appears to be inserting words that are more logical than those contained in the transcript but these insertions are based on after the fact discussions with witnesses no longer under oath and are pure speculation.
4. If counsel for PGE wished to correct the hearing transcript she should have moved to do so at the hearing.
5. The list initially provided to CUB is attached for the ALJ's reference as Exhibit 1 to this motion. Attached as Exhibit 2 is a copy of the email trail discussing PGE's proposed changes with Intervenors. This email trail is important because it demonstrates that PGE was not trying to make scrivener error changes but rather to change the substance of the transcript. Exhibit 3 is a copy of the motion actually filed by PGE.

***B. Examples of non-scrivener changes requested by PGE.***

The most egregious of the requests to “correct” were on the original list provided to interveners but not filed with the Commission. That list contained the following:

- A. “Kaner” to “Pope” – clearly this is not a scrivener’s error there is simply no similarity to the two words and furthermore Counsel for CUB remembers smiling at the hearing when the wrong name was used.
- B. “outlines” to “targets” – again this is not a scrivener’s error there is simply no similarity to the two words. CUB notes that in the filed motion PGE is now saying that the word should be “outliers”. Did their witness have a third change of remembrance in regard to this word? Or was PGE simply reacting to a statement made by Staff’s attorney. See email from Stephanie Andrus dated September 13, 2011 wherein she noted that “outliers” would have been closer to “outlines” than PGE’s then proposed change of “targets”.

While there are changes that are requested that are obvious – anyone up on the record knows what those words should have been<sup>2</sup> – they are also so obvious that there is no need to change them, and anyway, those words would not affect the substance of the transcript and the evidence. It is all of the other words that are problematic. Changing “Q1, Q2 and Q4 gas” to “Q1, Q3 and Q4 gas”. This changes the substance of the record – this is a very significant change. Replacing “abiding” with “exposing” - clearly, these words have nothing aurally in common and cannot be mere scrivener’s error. Inserting “not” before “liquid” completely changes the substance of the transcript. Replacing “plus” with “less” - again, these words have nothing aurally in common and making this change would completely change the substance of the record. “Delivery” with “deliveries at the CO Cal Border” adds an entire phrase apparently unspoken by the witness. “Disapproval” with “this approval” again is a substance change. “Head” with “net” – clearly two words with nothing aurally in common that cannot be

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<sup>2</sup> “bar” to “var” and “Barley’s” to Barclay’s”

scrivener's error. Replacing "the" with "it is an" – clearly this was not scrivener's error these words have nothing aurally in common.

***C. Scrivener's Error and Witness Error are two different things.***

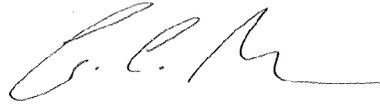
Scrivener's error and witness error are two different things. In all its years of practicing before the Commission CUB does not remember another time when anyone suggested that the hearing transcript record should be changed. Frankly, CUB is aghast that anyone would ever suggest such a thing, especially when there is no audio record to which the transcript can be compared.

**Conclusion.**

CUB respectfully requests that the Commission deny PGE's request to "Correct" the transcript from the August 30, 2011 hearing. CUB does not believe that it is appropriate to make corrections to a hearing transcript, especially one where there is no audio recording that the court reporter can listen to for verification. The hearing transcript is the final evidence in this case and should not be subject to change at the whim of any party including PGE. PGE's attempt to change this transcript is a blatant attempt to alter the substance of the record in this proceeding. Permitting such "correction" would set a dangerous precedent.

Dated this 19<sup>th</sup> day of September, 2011.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'G. C. M.', written in a cursive style.

G. Catriona McCracken, OSB #933587  
General Counsel, Regulatory Program Director  
Citizens' Utility Board of Oregon  
610 SW Broadway, Suite 400  
Portland OR 97205  
(503) 227-1984 ph  
(503) 274-2956 fax  
[Catriona@oregoncub.org](mailto:Catriona@oregoncub.org)

**Catriona McCracken**

---

**From:** Lisa Kaner [LisaKaner@mhgm.com]  
**Sent:** Monday, September 12, 2011 4:58 PM  
**To:** 'Brad Van Cleve'; 'HULSE Carol'; Catriona McCracken; 'Melinda J. Davison'; 'ANDRUS Stephanie'  
**Cc:** 'Doug Tingey'; Tami Hall  
**Subject:** UE 228 - Conferring on PGE's motion to correct the transcript  
**Attachments:** 269320.docxx.doc

All – PGE intends to file a motion to correct the transcript. The motion is attached. Please let me know as soon as possible whether you have any objections (so we can complete the highlighted sentence). We would like to get it filed tomorrow if possible. Thank you for your attention to this. Best regards, Lisa

**LISA A. KANER** | Lawyer | Markowitz, Herbold, Glade & Mehlhaf, PC  
3000 Pacwest Center, 1211 SW Fifth Avenue, Portland, OR 97204-3730  
Phone (503) 295-3085 | Fax (503) 323-9105 | [LisaKaner@MHGM.com](mailto:LisaKaner@MHGM.com)  
[LinkedIn](#) | [Bio](#) | [www.MHGM.com](http://www.MHGM.com) | [MHGM on Facebook](#)

CLB Exh 1 to Motion at 2

CUB Exh. 1 to Motion at 3

BEFORE THE PUBLIC UTILITY  
COMMISSION OF OREGON

UE 228

In the Matter of  
PORTLAND GENERAL ELECTRIC  
COMPANY  
2012 Annual power Cost Update Tariff  
(Schedule 125)

PORTLAND GENERAL ELECTRIC  
COMPANY'S MOTION TO  
CORRECT HEARING TRANSCRIPT  
DATED AUGUST 30, 2011

Portland General Electric Company (PGE) moves for an order directing that the transcript of the proceedings before Administrative Law Judge Shani Pines of the Public Utility Commission on August 30, 2011 be corrected as listed in the tables below.

PGE has conferred with counsel for ICNU, CUB and Staff, and

| <u>Page</u> | <u>Line</u> | <u>Proposed Correction</u>                                    |
|-------------|-------------|---|
| 30          | 16          | Replace "that SO CAL ordered" with "at So Cal Border"         |
| 36          | 22          | Insert "not" before "liquid"                                  |
| 50          | 9           | Replace "Q1, Q2 and Q4 gas" with "Q1, Q3 and Q4 gas"          |
| 60          | 8           | Replace "plus" with ", less"                                  |
| 65          | 21          | Replace "size" with "sides"                                   |
| 68          | 9           | Replace "marketing grade" with "market heat rate"             |
| 68          | 18          | Replace "power transactions as" with "power transactions. As" |
| 86          | 3           | Replace "Kaner's" with "Pope's"                               |
| 107         | 17          | Replace "closed" with "close"                                 |
| 149         | 16          | Replace "bar" with "Var"                                      |
| 150         | 3           | Replace "outlines" with "targets"                             |
| 155         | 25          | Replace "head" with "net"                                     |
| 157         | 5           | Replace "Barley's" with "Barclay's"                           |
| 160         | 2           | Replace "the" with "it is an"                                 |

PGE has identified the following additional transcription errors for which the court reporter will need to review the recording to determine the actual testimony:

| <u>Page</u> | <u>Line</u> | <u>Correction Required</u>  |
|-------------|-------------|---|
| 111         | 4-6         | Fill in apparent gap/omission   |
| 113         | 14          | Correct "which were all delivery"   |
| 132         | 12-14       | Fill in apparent gap/omission   |
| 156         | 2-3         | Correct "in abiding themselves to open prices or being committed to any single prices for closing commodity." |

DATED this \_\_\_\_ day of September, 2011.

Respectfully submitted,

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Douglas C. Tingey, OSB No. 044366  
Assistant General Counsel  
Portland General Electric Company  
121 SW Salmon Street, 1WTC1301  
Portland, OR 97204  
503-464-8926 (telephone)  
503-464-2200 (fax)  
doug.tingey@pge.com

Case 60h 1 is motion at 5

**Catriona McCracken**

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**From:** Lisa Kaner [LisaKaner@mhgm.com]  
**Sent:** Tuesday, September 13, 2011 8:54 AM  
**To:** 'Brad Van Cleve'; Catriona McCracken; 'Melinda J. Davison'; 'ANDRUS Stephanie'  
**Cc:** 'Doug Tingey'; Tami Hall  
**Subject:** UE 228 - A few more corrections -- Conferring on PGE's motion to correct the transcript  
**Attachments:** 269320.doc~~xxx~~.doc

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

All – In addition to the corrections on the draft provided yesterday, we have a few more to add:

- Page 67, line 8, Replace “signed” with “designed”
- Page 71, line 1, Replace “stock” with “stack”
- Page 71, line 3, Replace “swimming” with “skimming”

These additions are reflected on the attached revised draft motions. I look forward to hearing from each of you this morning, if possible, so that we can get this filed this afternoon. Many thanks. -Lisa

---

**From:** Lisa Kaner  
**Sent:** Monday, September 12, 2011 4:58 PM  
**To:** 'Brad Van Cleve'; 'HULSE Carol'; 'Catriona McCracken'; 'Melinda J. Davison'; 'ANDRUS Stephanie'  
**Cc:** 'Doug Tingey'; Tami Hall  
**Subject:** UE 228 - Conferring on PGE's motion to correct the transcript

All – PGE intends to file a motion to correct the transcript. The motion is attached. Please let me know as soon as possible whether you have any objections (so we can complete the highlighted sentence). We would like to get it filed tomorrow if possible. Thank you for your attention to this. Best regards, Lisa

LISA A. KANER | Lawyer | Markowitz, Herbold, Glade & Mehlhaf, PC  
3000 Pacwest Center, 1211 SW Fifth Avenue, Portland, OR 97204-3730  
Phone (503) 295-3085 | Fax (503) 323-9105 | [LisaKaner@MHGM.com](mailto:LisaKaner@MHGM.com)  
[LinkedIn](#) | [Bio](#) | [www.MHGM.com](http://www.MHGM.com) | [MHGM on Facebook](#)



**Catriona McCracken**

---

**From:** Lisa Kaner [LisaKaner@mhgm.com]  
**Sent:** Wednesday, September 14, 2011 12:31 PM  
**To:** 'Andrus Stephanie'; Catriona McCracken; 'ANDRUS Stephanie'; 'Melinda J. Davison'; 'Brad Van Cleve'  
**Cc:** 'Doug Tingey'; Tami Hall  
**Subject:** RE: UE 228 - Conferring on PGE's REVISED motion to correct the transcript

We understand, thanks. We will continue to note Staff's objection too. -Lisa

---

**From:** Andrus Stephanie [mailto:stephanie.andrus@doj.state.or.us]  
**Sent:** Wednesday, September 14, 2011 12:30 PM  
**To:** Lisa Kaner; 'Catriona McCracken'; 'ANDRUS Stephanie'; 'Melinda J. Davison'; 'Brad Van Cleve'  
**Cc:** 'Doug Tingey'; Tami Hall  
**Subject:** RE: UE 228 - Conferring on PGE's REVISED motion to correct the transcript

Sorry for not getting back to you sooner. I also continue to object. I don't dispute that the corrections you make reflect what the witnesses meant to say or should have said, but I have no way of verifying that these changes make sure that the record accurately reflects the hearing.

Also, re: "outlier." I am not suggesting that I recall that this is what Shani Pines said. I am suggesting that it is possible that she said this (sounds more like outline than target).

Please note on your motion that staff also objects.

Thanks

Stephanie

-----Original Message-----

**From:** Lisa Kaner [mailto:LisaKaner@mhgm.com]  
**Sent:** Wednesday, September 14, 2011 12:23 PM  
**To:** 'Catriona McCracken'; 'ANDRUS Stephanie'; 'Melinda J. Davison'; 'Brad Van Cleve'  
**Cc:** 'Doug Tingey'; Tami Hall  
**Subject:** RE: UE 228 - Conferring on PGE's REVISED motion to correct the transcript

Catriona – We will note that CUB objects. You are free to file the reasons for CUB's objection, but I am not aware of any obligation that we make your arguments in our motion. If I am incorrect, please let me know. Thanks. - Lisa

---

**From:** Catriona McCracken [mailto:Catriona@oregoncub.org]  
**Sent:** Wednesday, September 14, 2011 11:11 AM  
**To:** Lisa Kaner; 'ANDRUS Stephanie'; Melinda J. Davison; Brad Van Cleve  
**Cc:** 'Doug Tingey'; Tami Hall; Sommer Templet; Bob Jenks; Gordon Feighner; John Sturm  
**Subject:** RE: UE 228 - Conferring on PGE's REVISED motion to correct the transcript

Lisa:

CUB continues to object to the entire process. Please include the following sentence in your motion: "CUB does not believe that it is appropriate to make corrections to a hearing transcript especially one where there is no audio recording that the court reporter can listen to for verification. CUB recommends that the Commission deny PGE's request to "correct" the transcript as many of PGE's requests are far beyond the bounds of mere scrivener's error and affect the substance of the transcribed material."

Catriona

G. Catriona McCracken, General Counsel  
Regulatory Program Director  
Citizens' Utility Board of Oregon  
610 SW Broadway, Suite 400  
Portland OR 97205  
(503)227-1984 Ext. 16  
(503)274-2596 fax  
Catriona@oregoncub.org

\*\*\*\*\* CONFIDENTIALITY NOTICE \*\*\*\*\*

This e-mail may contain information that is privileged, confidential, or otherwise exempt from disclosure under applicable law. If you are not the addressee or it appears from the context or otherwise that you have received this e-mail in error, please advise me immediately by reply e-mail, keep the contents confidential, and immediately delete the message and any attachments from your system.

---

**From:** Lisa Kaner [mailto:LisaKaner@mhgm.com]  
**Sent:** Wednesday, September 14, 2011 9:27 AM  
**To:** 'ANDRUS Stephanie'; Catriona McCracken; Melinda J. Davison; Brad Van Cleve  
**Cc:** 'Doug Tingey'; Tami Hall  
**Subject:** UE 228 - Conferring on PGE's REVISED motion to correct the transcript  
**Importance:** High

Stephanie, Catriona, Melinda and Brad – We checked with both the PUC and the court reporter and there is no recording of the hearing on Aug. 30. Consequently, we have changed the motion to correct the transcript to propose corrections for each of the transcription errors. Where you have identified below your memory of the testimony, we have made those changes (e.g. left “Kaner”, revised to change to “outliers”). As for the rest, we have checked with our witnesses whose testimony is being corrected, and believe these corrections are accurate. Please consider the revised motion (redlined to show changes) and let us know whether we can represent that ICNU has no objection, and whether CUB and Staff still object to some of the corrections. We will be filing this afternoon. Thanks. –Lisa

LISA A. KANER | Lawyer | Markowitz, Herbold, Glade & Mehlhaf, PC  
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[LinkedIn](#) | [Bio](#) | [www.MHGM.com](http://www.MHGM.com) | [MHGM on Facebook](#)

---

**From:** Andrus Stephanie [mailto:stephanie.andrus@doj.state.or.us]  
**Sent:** Tuesday, September 13, 2011 1:30 PM  
**To:** 'Catriona McCracken'; Lisa Kaner; 'Brad Van Cleve'; 'Melinda J. Davison'; 'ANDRUS Stephanie'  
**Cc:** 'Doug Tingey'; Tami Hall; Bob Jenks; Gordon Feighner; Sommer Templet  
**Subject:** RE: UE 228 - Conferring on PGE's motion to correct the transcript

Lisa,

I am of the same mind as Catriona. I was also particularly troubled by the proposed corrections to "Kaner" and "outlines." With respect to "outlines," the ALJ may have said "outliers," rather than "targets." Most of the changes are similar to this. You have inserted words that are more logical than what has been transcribed, but I am assuming that these insertions are based on speculation as to what the witnesses meant, rather than memory.

Would it be possible to send all these proposed changes to the court reporter so that she can listen to the audio record and determine whether the errors that you have identified are indeed errors and make any necessary changes?

Another matter regarding the transcript that is probably appropriately directed to Doug. I believe a good portion of the Staff's brief will be confidential because it refers to confidential information in ICNU's testimony. However, in some cases, PGE has the same information in its testimony and it is not marked as confidential. (At the hearing, ICNU's counsel noted that their confidential designations are based entirely on designations PGE had made when they provided information to ICNU.)

Would it be possible for PGE to review the testimony of ICNU and CUB and report to the parties which portions of that testimony are in fact confidential?

Thanks,

Stephanie Andrus  
(503) 947-4760

-----Original Message-----

**From:** Catriona McCracken [mailto:Catriona@oregoncub.org]  
**Sent:** Tuesday, September 13, 2011 1:04 PM  
**To:** Lisa Kaner; 'Brad Van Cleve'; 'Melinda J. Davison'; 'ANDRUS Stephanie'  
**Cc:** 'Doug Tingey'; Tami Hall; Bob Jenks; Gordon Feighner; Sommer Templet  
**Subject:** RE: UE 228 - Conferring on PGE's motion to correct the transcript

Hi Lisa:

Got your draft motion and your voicemail and have reviewed your requests to amend the transcript. Frankly, even if I agreed that a hearing transcript could be amended I think your requests to amend go well beyond the bounds of scrivener error. I remember smiling when your name was spoken in lieu of Ms. Pope's name. While that may have been an error it is not a scrivener's error and I do not believe it is subject to change. I have similar concerns about other requests such as the request to change "outlines" to "targets". Essentially we would object to any and all changes in the first email other than those related to "var" and "bar" and Barclays. I would be okay with the changes proposed in the second email but again, I am really not sure that this is an appropriate process at all. The changes in the second email are all obvious and therefore it is not necessary to make them. They do not affect the context. Bottom line, CUB objects to the request to amend the transcript.

Catriona

G. Catriona McCracken, General Counsel  
Regulatory Program Director  
Citizens' Utility Board of Oregon  
610 SW Broadway, Suite 400  
Portland OR 97205  
(503)227-1984 Ext. 16  
(503)274-2596 fax  
Catriona@oregoncub.org

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**Cc:** 'Doug Tingey'; Tami Hall

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We would like to get it filed tomorrow if possible. Thank you for your attention to this. Best regards,  
Lisa

**LISA A. KANER** | Lawyer | Markowitz, Herbold, Glade & Mehlfaf, PC

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Phone (503) 295-3085 | Fax (503) 323-9105 | [LisaKaner@MHGM.com](mailto:LisaKaner@MHGM.com)

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**Portland General Electric Company**  
Legal Department  
121 SW Salmon Street • Portland, Oregon 97204  
(503) 464-8926 • Facsimile (503) 464-2200

**Douglas C. Tingey**  
Assistant General Counsel

September 14, 2011

*Via Electronic Filing and U.S. Mail*

Oregon Public Utility Commission  
Attention: Filing Center  
550 Capitol Street NE, #215  
PO Box 2148  
Salem OR 97308-2148

**Re: UE 228**

Attention Filing Center:

Enclosed for filing in the captioned docket are an original and two copies of:

- **MOTION TO CORRECT HEARING TRANSCRIPT DATED AUGUST 30, 2011**

This is being filed by electronic mail with the Filing Center. An extra copy of the cover letter is enclosed. Please date stamp the extra copy and return to me in the envelope provided.

Thank you in advance for your assistance.

Sincerely,

**DOUGLAS C. TINGEY**  
Assistant General Counsel

DCT:cbm  
Enclosures  
cc: UE 228 Service List

**BEFORE THE PUBLIC UTILITY  
COMMISSION OF OREGON**

UE 228

In the Matter of  
**PORTLAND GENERAL ELECTRIC  
 COMPANY**  
 2012 Annual power Cost Update Tariff  
 (Schedule 125)

**PORTLAND GENERAL ELECTRIC  
 COMPANY'S MOTION TO  
 CORRECT HEARING TRANSCRIPT  
 DATED AUGUST 30, 2011**

Portland General Electric Company (PGE) moves for an order directing that the transcript of the proceedings before Administrative Law Judge Shani Pines of the Public Utility Commission on August 30, 2011, be corrected as listed in the tables below.

PGE has conferred with counsel for ICNU, CUB and Staff. ICNU does not object. CUB and Staff object to the proposed corrections.

To the extent PGE seeks to correct the testimony of witnesses PGE called to testify, PGE has consulted with each of those witnesses and determined that the proposed correction accurately reflects their testimony at the hearing.

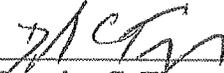
| <b>Page</b> | <b>Line</b> | <b>Proposed Correction</b>  |
|-------------|-------------|---|
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| 65          | 21          | Replace "size" with "sides"   |
| 67          | 8           | Replace "signed" with "designed"  |
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| 68          | 18          | Replace "power transactions as" with "power transactions. As"                         |
| 71          | 1           | Replace "stock" with "stack"  |
| 71          | 3           | Replace "swimming" with "skimming"  |
| 107         | 17          | Replace "closed" with "close"   |
| 113         | 14          | Replace "delivery" with "deliveries at So Cal border."                                |
| 132         | 14          | Replace "disapproval" with "this approval"  |
| 149         | 16          | Replace "bar" with "Var"  |
| 150         | 3           | Replace "outlines" with "outliers"  |
| 155         | 25          | Replace "head" with "net"   |
| 156         | 1           | Replace "strong" with "long"  |
| 156         | 2           | Replace "in abiding" with "and exposing"  |
| 156         | 3           | Replace "prices for closing commodity" with "price for closing a commodity position." |

Sub Exh 3 to Motion at 3

|     |   |                                     |
|-----|---|-------------------------------------|
| 157 | 5 | Replace "Barley's" with "Barclay's" |
| 160 | 2 | Replace "the" with "it is an"       |

DATED this 14<sup>th</sup> day of September, 2011.

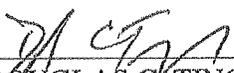
Respectfully submitted,

  
\_\_\_\_\_  
Douglas C. Tingey, OSB No. 044366  
Assistant General Counsel  
Portland General Electric Company  
121 SW Salmon Street, 1WTC1301  
Portland, OR 97204  
503-464-8926 (telephone)  
503-464-2200 (fax)  
doug.tingey@pgn.com

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day caused **MOTION TO CORRECT HEARING TRANSCRIPT DATED AUGUST 30, 2011** to be served by electronic mail to those parties whose email addresses appear on the attached service list for OPUC Docket No. UE 228.

Dated at Portland, Oregon, this 14<sup>th</sup> day of September, 2011.

  
\_\_\_\_\_  
DOUGLAS C. TINGEY, OSB #044366  
Assistant General Counsel  
Portland General Electric Company  
121 SW Salmon St., 1WTC1301  
Portland, OR 97204  
(503) 464-8926 (Telephone)  
(503) 464-2200 (Fax)  
[Doug.tingey@pgn.com](mailto:Doug.tingey@pgn.com)

**SERVICE LIST  
DOCKET UE 228**

|  |   |
|--|---|
| Gordon Feighner (C)<br>CITIZENS' UTILITY BOARD OF OREGON<br><a href="mailto:gordon@oregoncub.org">gordon@oregoncub.org</a>                       | Robert Jenks (C)<br>CITIZENS' UTILITY BOARD OF OREGON<br><a href="mailto:bob@oregoncub.org">bob@oregoncub.org</a>                       |
| G. Catriona McCracken (C)<br>CITIZENS' UTILITY BOARD OF OREGON<br><a href="mailto:catriona@oregoncub.org">catriona@oregoncub.org</a>             | Kevin Higgins, Principle (C)<br>ENERGY STRATEGIES, LLC<br><a href="mailto:khiggins@energystrat.com">khiggins@energystrat.com</a>        |
| Irion Sanger (C)<br>DAVISON VAN CLEVE, PC<br><a href="mailto:mail@dvclaw.com">mail@dvclaw.com</a>  | S. Bradley Van Cleve (C)<br>DAVISON VAN CLEVE, PC<br><a href="mailto:mail@dvclaw.com">mail@dvclaw.com</a>                               |
| Greg Bass<br>NOBLE AMERICAS ENERGY SOLUTIONS<br><a href="mailto:gbass@noblesolutions.com">gbass@noblesolutions.com</a>                           | Ed Durrenberger (C)<br>OREGON PUBLIC UTILITY COMMISSION<br><a href="mailto:ed.durrenberger@state.or.us">ed.durrenberger@state.or.us</a> |
| Stephanie S. Andrus, Assistant AG (C)<br>DEPARTMENT OF JUSTICE<br><a href="mailto:Stephanie.andrus@state.or.us">Stephanie.andrus@state.or.us</a> | Donald Schoenbeck (C)<br>REGULATORY & COGENERATION<br>SERVICES, INC.<br><a href="mailto:dws@r-c-s-inc.com">dws@r-c-s-inc.com</a>        |
| Gregory M. Adams, Attorney (C)<br>RICHARDSON & O'LEARY<br><a href="mailto:greg@richardsonandoleary.com">greg@richardsonandoleary.com</a>         |   |



## UE 228 – CERTIFICATE OF SERVICE

I hereby certify that, on this 19<sup>th</sup> day of September, 2011, I served the foregoing **CITIZENS' UTILITY BOARD OF OREGON'S RESPONSE TO PGE MOTION TO CORRECT HEARING TRANSCRIPT DATED AUGUST 30, 2011** in docket UE 228 upon each party listed in the UE 228 OPUC Service List by email and, where paper service is not waived, by U.S. mail, postage prepaid, and upon the Commission by email and by sending one original and one copy by U.S. mail, postage prepaid, to the Commission's Salem offices.

**(W denotes waiver of paper service)**

**(C denotes service of Confidential material authorized)**

**W PUBLIC UTILITY COMMISSION**  
**C ED DURRENBERGER**  
PO BOX 2148  
SALEM OR 97308-2148  
[ed.durrenberger@state.or.us](mailto:ed.durrenberger@state.or.us)

**W DAVISON VAN CLEVE**  
**C IRION A SANGER**  
333 SW TAYLOR - STE 400  
PORTLAND OR 97204  
[mail@dvclaw.com](mailto:mail@dvclaw.com)

**W DAVISON VAN CLEVE PC**  
**C S BRADLEY VAN CLEVE**  
333 SW TAYLOR - STE 400  
PORTLAND OR 97204  
[mail@dvclaw.com](mailto:mail@dvclaw.com)

**W ENERGY STRATEGIES LLC**  
**C KEVIN HIGGINS**  
214 STATE ST - STE 200  
SALT LAKE UT 84111-2322  
[khiggins@energystrat.com](mailto:khiggins@energystrat.com)

**W NOBLE AMERICAS ENERGY SOLUTIONS, LLC**  
**C GREG BASS**  
401 WEST A ST., STE. 500  
SAN DIEGO CA 92101  
[gbass@noblesolutions.com](mailto:gbass@noblesolutions.com)

**W PORTLAND GENERAL ELEC.**  
**C RANDY DAHLGREN**  
121 SW SALMON ST - 1WTC0702  
PORTLAND OR 97204  
[pge.opuc.filings@pgn.com](mailto:pge.opuc.filings@pgn.com)

**W PORTLAND GENERAL ELEC.**  
**C DOUGLAS C TINGEY**  
121 SW SALMON 1WTC13  
PORTLAND OR 97204  
[doug.tingey@pgn.com](mailto:doug.tingey@pgn.com)

**W DEPARTMENT OF JUSTICE**  
**C STEPHANIE S ANDRUS**  
1162 COURT ST NE  
SALEM OR 97301-4096  
[stephanie.andrus@state.or.us](mailto:stephanie.andrus@state.or.us)

**W REGULATORY & COGEN SERVICES INC**  
**C DONALD W SCHOENBECK (C)**  
900 WASHINGTON ST STE 780  
VANCOUVER WA 98660-3455  
[dws@r-c-s-inc.com](mailto:dws@r-c-s-inc.com)

**W RICHARDSON & O'LEARY**  
**C GREGORY M. ADAMS**  
PO BOX 7218  
BOISE ID 83702  
[greg@richardsonandoleary.com](mailto:greg@richardsonandoleary.com)

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'G. McCracken', with a long horizontal flourish extending to the right.

G. Catriona McCracken, OSB #933587  
General Counsel, Regulatory Program Director  
Citizens' Utility Board of Oregon  
610 SW Broadway, Suite 400  
Portland OR 97205  
(503) 227-1984 ph  
(503) 274-2956 fax  
[Catriona@oregoncub.org](mailto:Catriona@oregoncub.org)