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November 20, 2006

VIA E-FILING & FIRST CLASS MAIL

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

Re: *UM 1224*

Attention Filing Center:

Enclosed for filing in the above-referenced docket are an original and a courtesy copy of Portland General Electric Company's Comments on Renewal Application. 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 cursive script that reads "Leslie Hurd".

Leslie Hurd, Legal Assistant to
David F. White

/ldh

Enclosure

cc (w/enc.): Service List

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**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON
UM 1224**

In the Matter of


UTILITY REFORM PROJECT and
KEN LEWIS

Application for Deferred Accounting

**PORTLAND GENERAL ELECTRIC
COMPANY'S COMMENTS ON
RENEWAL APPLICATION**

For the reasons stated in Portland General Electric Company's ("PGE") Amended Comments and Reply Comments to be filed on November 21, 2006, PGE opposes the deferred accounting application (the "Application") and its requested renewal. The Commission should deny the Application.

DATED this 20th day of November, 2006.



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CERTIFICATE OF SERVICE

I hereby certify that on this day I served the foregoing **PORTLAND GENERAL ELECTRIC COMPANY'S COMMENTS ON RENEWAL APPLICATION** by mailing a copy thereof in a sealed envelope, first-class postage prepaid, addressed to each party listed below, deposited in the U.S. Mail at Portland, Oregon.

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DATED this 20th day of November, 2006.



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