

CABLE HUSTON BENEDICT HAAGENSEN & LLOYD LLP

**ATTORNEYS AT LAW
SUITE 2000
1001 SW FIFTH AVENUE
PORTLAND, OREGON 97204-1136**

**TELEPHONE (503) 224-3092
FACSIMILE (503) 224-3176**

EDWARD A. FINKLEA

EFINKLEA@CHBH.COM
www.cablehuston.com

December 4, 2006

VIA E-MAIL & FIRST CLASS MAIL

Judge Christina Hayes
Oregon Public Utility Commission
550 Capitol St. NE, #215
PO Box 2148
Salem, OR 97308-2148

Re: UE 180 – In the Matter of Portland General Electric Company
Request for a General Rate Revision

Dear Judge Hayes:

Pursuant to your Order dated November 22, 2006, the Eugene Water & Electric Board (“EWEB”) hereby requests five minutes at the oral argument in this proceeding to address the one issue EWEB has raised in this case. EWEB does not intend to address any confidential material.

Thank you for your attention to this matter.

Very truly yours,



Edward A. Finklea

EAF/tr

cc: UE-180 Service List (via email & first class mail)

CERTIFICATE OF SERVICE

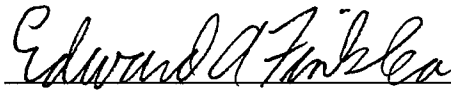
I CERTIFY that I have on this day served the foregoing document upon all parties by routing a copy via electronic mail and/or by mailing a copy properly addressed with first class postage prepaid to each party indicated on the current service list maintained by the Oregon Public Utility Commission in this proceeding.

ROBERT VALDEZ PO BOX 2148 SALEM OR 97308-2148 bob.valdez@state.or.us	MICHAEL L KURTZ KURT J BOEHM BOEHM KURTZ & LOWRY 36 E SEVENTH ST - STE 1510 CINCINNATI OH 45202 mkurtz@bklawfirm.com kboehm@bklawfirm.com
GEOFFREY M KRONICK LC7 BONNEVILLE POWER ADMINISTRATION PO BOX 3621 PORTLAND OR 97208-3621 gmkronick@bpa.gov	CRAIG SMITH BONNEVILLE POWER ADMINISTRATION PO BOX 3621--L7 PORTLAND OR 97208-3621 cmsmith@bpa.gov
JAMES T SELECKY BRUBAKER & ASSOCIATES, INC. 1215 FERN RIDGE PKWY, SUITE 208 ST. LOUIS MO 63141 jtselecky@consultbai.com	JASON EISDORFER LOWREY R BROWN CITIZENS' UTILITY BOARD OF OREGON 610 SW BROADWAY - STE 308 PORTLAND OR 97205 lowrey@oregoncub.org
JIM ABRAHAMSON COMMUNITY ACTION DIRECTORS OF OREGON PO BOX 7964 SALEM OR 97303-0208 jim@cado-oregon.org	S BRADLEY VAN CLEVE DAVISON VAN CLEVE PC 333 SW TAYLOR - STE 400 PORTLAND OR 97204 mail@dvclaw.com
STEPHANIE S ANDRUS DEPARTMENT OF JUSTICE REGULATED UTILITY & BUSINESS SECTION 1162 COURT ST NE SALEM OR 97301-4096 stephanie.andrus@state.or.us	KATHERINE A MCDOWELL MCDOWELL & ASSOCIATES PC 520 SW SIXTH AVENUE, SUITE 830 PORTLAND OR 97204 katherine@mcd-law.com
LON PETERS * NORTHWEST ECONOMIC RESEARCH INC 607 SE MANCHESTER PLACE PORTLAND OR 97202 lpeters@pacifier.com	JIM DEASON ATTORNEY AT LAW 1 COLUMBIA ST., SUITE 1600 PORTLAND, OR 97258-2014 Jim.deason@comcast.net
LAURA BEANE MANAGER, REGULATION PACIFICORP 825 MULTNOMAH STE 800 PORTLAND OR 97232-2153 laura.beane@pacificorp.com	PORTLAND GENERAL ELECTRIC COMPANY PGE-OPUC FILINGS RATES & REGULATORY AFFAIRS 121 SW SALMON ST 1WTC0702 PORTLAND OR 97204

<p>BENJAMIN WALTERS * DEPUTY CITY ATTORNEY CITY OF PORTLAND 1221 SW 4TH AVE, ROOM 430 PORTLAND, OR 97204</p>	<p>RICHARD GRAY * STRATEGIC PROJECTS MGR/SMIF ADM. CITY OF PORTLAND 1120 SW 5TH AVE, ROOM 800 PORTLAND, OR 97204</p>
<p>DAVID TOOZE * PORTLAND CITY OF ENERGY OFFICE 721 NW 9TH AVE -- SUITE 350 PORTLAND OR 97209-3447 dtooze@ci.portland.or.us</p>	<p>DOUGLAS C TINGEY PORTLAND GENERAL ELECTRIC 121 SW SALMON 1WTC13 PORTLAND OR 97204</p>
<p>THEODORE E ROBERTS LINDA WRAZEN SEMPRA GLOBAL 101 ASH ST HQ 13D SAN DIEGO CA 92101-3017 troberts@sempra.com lwrazen@sempraglobal.com</p>	<p>SCOTT H. DEBROFF SMIGEL ANDERSON & SACKS RIVER CHASE OFFICE CENTER 4431 NORTH FRONT ST HARRISBURG, PA 17110 sdebroyff@sasllp.com</p>
<p>ANN L. FISHER ATTORNEY AT LAW PO BOX 25302 PORTLAND, OR 97298-0302 energlaw@aol.com</p>	<p>DANIEL MEEK ATTORNEY AT LAW 10949 SW 4TH AVE PORTLAND, OR 97219 dan@meek.net</p>
<p>LORNE WHITTLES MGR - PNW MARKETING EPCOR MERCHANT & CAPITAL 1161 W RIVER ST STE 250 BOISE ID 83702 lwhittles@epcor.ca</p>	<p>DAVID R RIS SR. ASST. CITY ATTORNEY GRESHAM CITY ATTORNEY'S OFFICE CITY OF GRESHAM 1333 NW EASTMAN PARKWAY GRESHAM OR 97030 david.ris@ci.gresham.or.us</p>
<p>JOHN HARRIS TRANSPORTATION OPERATIONS SUPERINTENDENT CITY OF GRESHAM 1333 NW EASTMAN PKWY GRESHAM OR 97030 john.harris@ci.gresham.or.us</p>	<p>LINDA K WILLIAMS ATTORNEY AT LAW KAFOURY & MCDUGAL 10266 SW LANCASTER RD PORTLAND OR 97219-6305 linda@lindawilliams.net</p>

ANDREA FOGUE SENIOR STAFF ASSOCIATE LEAGUE OF OREGON CITIES PO BOX 928 1201 COURT ST NE STE 200 SALEM OR 97308 afogue@orcities.org	ELISA M LARSON ALEX MILLER NORTHWEST NATURAL 220 NW 2ND AVE PORTLAND OR 97209 elisa.larson@nwnatural.com alex.miller@nwnatura.com
WILLIAM H CHEN REGULATORY CONTACT CONSTELLATION NEWENERGY INC 2175 N CALIFORNIA BLVD STE 300 WALNUT CREEK CA 94596 bill.chen@constellation.com	HARVARD P. SPIGAL PRESTON GATES ELLIS LLP 222 SW COLUMBIA ST STE 1400 PORTLAND, OR 97201-6632 hspigal@prestongates.com

Dated in Portland, Oregon, this 4th day of December, 2006.



Edward A. Finklea, OSB #84216
 J. Laurence Cable, OSB # 71035
 Cable Huston Benedict Haagensen
 & Lloyd LLP
 1001 SW Fifth Ave., Suite 2000
 Portland, OR 97204-1136
 Telephone: (503) 224-3092
 Facsimile: (503) 224-3176
 E-Mail: efinklea@chbh.com
lcable@chbh.com

Of Attorneys for
 Eugene Water & Electric Board