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Irion A. Sanger

December 14, 2009

Via Electronic and U.S. Mail

Hon. Sarah Wallace and Hon. Lisa Hardie
Oregon Public Utility Commission
550 Capital St. NE Suite 215
Salem, Oregon 97308-2148

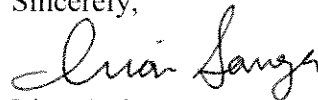
RE: Joint Parties Reply Brief

Dear Judges Wallace and Hardie:

On December 10, 2009, the Joint Parties in support of the revenue requirement stipulation ("Joint Parties") sent a letter stating that they elected not file a brief on the legal issues regarding rate base, but that they "will file briefs discussing the rate base legal standard if the Commission determines which briefs would assist in its resolution of this proceeding." The Industrial Customers of Northwest Utilities ("ICNU") is opposed to the Commission providing the Joint Parties an additional opportunity to brief issues that they should have already addressed in their opening and reply briefs. The Joint Parties were well aware of ICNU's rate base issues because ICNU raised these issues in Mr. Early's and Ms. Blumenthal's testimonies, and the Joint Parties had ample opportunity to brief rate base issues. In addition, authorizing the Joint Parties to file an additional brief would allow the Joint Parties an improper response to ICNU's reply brief.

ICNU respectfully requests that no additional briefing be allowed. If the Commission elects to allow the Joint Parties to file a new legal brief, then ICNU should be given the opportunity to respond. Thank you for consideration of ICNU's position.

Sincerely,



Irion A. Sanger

cc: Service List