

BEFORE THE OREGON PUBLIC UTILITIES COMMISSION

UM 1121

In the Matter of

**OREGON ELECTRIC UTILITY
COMPANY, LLC, et al.**

**Application for Authorization to
Acquire Portland General Electric
Co.**

**CROSS-EXAMINATION
STATEMENT OF
UTILITY REFORM PROJECT**

The Utility Reform Project (URP) proposes to undertake cross-examination on the general subject matter of the 4 pre-approval conditions recommended in the Testimony of Daniel W. Meek:

1. The Commission should require OEUC to disclose all of the owners of its equity.
2. The Commission should recognize the "double leveraged" capital structure proposed by the Applicants for PGE (and thus recognize that the equity component of PGE's capital structure is very low).
3. The Commission should require PGE not to charge ratepayers for federal and/or state and/or local income taxes, and all other taxes, that PGE does not actually pay to government.
4. The Commission should require crediting to ratepayers all gains on subsequent sales of PGE or PGE Assets.

As the witnesses of the other parties do not always expressly address these conditions, we identify below the parties who appear to have offered witnesses who address similar topic areas and suggest that each party designate the appropriate witness or witnesses on the topics listed above. To the extent that a name is required, we offer our best guesses below.

We also seek to cross-examine the Local Applicant Panel for approximately 10 minutes regarding their expertise and conflicts of interest.

Party	Subject (see list above)	Estimated Time
Oregon Electric Utility (Davis)	1,2,3,4	15 minutes
Oregon Electric Utility (McDermott)	2,3,4	10 minutes
PGE (Tinker/Murray/Hager)	2,3,4	10 minutes
PGE (James Piro)	2,3,4	10 minutes
Staff (Thomas Morgan)	1,2,3,4	10 minutes
Staff (Judy Johnson)	3	5 minutes
CUB (Jenks/Brown)	2,3,4	10 minutes
CNU (Donald Schoenbeck)	2,3,4	5 minutes

Dated: October 12, 2004

Respectfully Submitted,

DANIEL W. MEEK
 10949 S.W. 4th Avenue
 Portland, OR 97219
 503-293-9021 voice
 503-293-9099 fax
 dan@meek.net

CERTIFICATE OF SERVICE

I hereby certify that I served the foregoing CROSS-EXAMINATION STATEMENT OF UTILITY REFORM PROJECT BY UTILITY REFORM PROJECT, ETC. by mailing a true and correct copy thereof, placed in a sealed envelope and deposited in the U.S. Postal Service at Portland, Oregon, on October 12, 2004, with the postage prepaid, to every person on the service list UM 1121 proceeding below for whom the list on the OPUC web site this day does not show an email address:

GRIEG ANDERSON
5919 W MILES ST.
PORTLAND OR 97219

I served the remainder of the service list by emailing this document in Wordperfect, Word, and PDF formats to every email address on the service list by using the Email Service List (comma delimited) link on the OPUC web site for this docket.

Dated: October 12, 2004

Daniel W. Meek