



Department of Energy

Bonneville Power Administration
P.O. Box 3621
Portland, Oregon 97208-3621

GENERAL COUNSEL

July 29, 2004

In reply refer to: LC-7

VIA FEDERAL EXPRESS

Hon. Kathryn A. Logan
Hon. Christina M. Smith
c/o Ms. Cheryl Walker
Public Utility Commission of Oregon
550 Capitol Street, NE, Suite 215
Salem, OR 97301-2551

Re: Docket UM-1121 – Oregon Electric Utility Company, LLC
Application for Authorization to Acquire Portland General Electric Company
Joint Issues List – Bonneville Power Administration and Eugene Water & Electric Board

Dear Ms. Walker:

Enclosed for filing are an original and five copies of the most recent version of the “Issues Lists” initially submitted separately by Bonneville Power Administration (“BPA”) and the Eugene Water & Electric Board (“EWEB”). These have recently been consolidated and reworded by BPA and EWEB legal counsel and are now being submitted as a single “joint” issues list. Copies are being served contemporaneously via electronic and U.S. Mail on all parties’ representatives indicated on the most recent service list compiled by the Public Utility Commission (“PUC”) on its electronic web site for this instant docket.

As noted by EWEB counsel during the status conference in this docket held on July 21, 2004, the “rewording” of EWEB’s previously submitted Issues List by PUC staff was not acceptable in that it expressed the issues concerning Trojan decommissioning in terms of whether they are relevant to this instant proceeding. It is EWEB’s and BPA’s position that such issues, as submitted by both EWEB and BPA, are indeed relevant and properly within the scope of this instant proceeding. It is also the understanding of EWEB and BPA counsel that no prejudice to EWEB’s or BPA’s ability to address these issues in this instant forum will result should any other party determine that the two “Trojan decommissioning” issues submitted here are not

“agreed upon” or “Part 1” issues as described in the presiding Administrative Law Judges’ most recent order in this matter dated July 21, 2004. (“Joint Issues List Due August 2; Additional Status Conference Set.”)

Sincerely,

Geoffrey M. Kronick
Of Counsel for the Bonneville Power Administration
Routing LC-7
P O Box 3621
Portland, OR 97208-3621
(503) 230-4201
Facsimile (503) 230-7405

cc:

Thomas M. Grim, Esq.
Cable Huston Benedict Haagensen & Lloyd, LLP

Service List – UM-1121

BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

UM 1121

In the Matter of)	
)	
OREGON ELECTRIC UTILITY COMPANY,)	Revised Joint Issues List of the
LLC, et al.)	Eugene Water & Electric Board
)	and the Bonneville Power Administration
Application for Authorization to Acquire Portland)	
General Electric Company.)	
)	
_____)	

EWEB/BPA Issue 1: Do the proposed terms of the acquisition of Portland General Electric (“PGE”) by Oregon Electric Utility Co., LLC increase the probability that PGE will be unable to pay its share of all anticipated and unanticipated future costs related to the Trojan Nuclear Project?

EWEB/BPA Issue 2: Should the Public Utility Commission of Oregon require PGE to post a surety bond, letter of credit, or provide insurance for a reasonable period of time and in a reasonable amount to ensure that the public and other Trojan owners are protected in the event that PGE is unable to pay some anticipated or unanticipated Trojan-related expense? If so, what type, term (length of time), and amount of financial protection would be reasonable?

July 29, 2004

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 1121

In the Matter of)	
)	
OREGON ELECTRIC UTILITY COMPANY,)	Revised Joint Issues List of the
LLC, et al.)	Eugene Water & Electric Board
)	and the Bonneville Power Administration
)	
Application for Authorization to Acquire Portland)	
General Electric Company.)	

CERTIFICATE OF SERVICE

I, Linda I. McDonald, do certify that I caused the foregoing “Revised Joint Issues List of the Eugene Water & Electric Board and the Bonneville Power Administration” to be served upon the Administrative Law Judges in this instant proceeding by causing an original and five true copies to be routed via Federal Express overnight delivery service to the Administrative Law Judges’ offices at the Public Utility Commission of Oregon, 550 Capitol Street, N.E., Suite 215, Salem, Oregon 97301-2551; and a single true copy to be served upon the representatives of all parties indicated on the Official Service List compiled in this proceeding by causing such copies to be deposited, postage prepaid, in a receptacle maintained by the United States Postal Service for the receipt of mail, to all addressees indicated on the most recent service list maintained by the Commission on its electronic web site, and via electronic mail to all addressees for whom such electronic mail addresses are noted on the most recent service list maintained by the Commission on its electronic web site.

Linda I. McDonald

(Date)

<p>JIM ABRAHAMSON COMMUNITY ACTION DIRECTORS OF OREGON 4035 12TH ST CUTOFF SE STE 110 SALEM OR 97302 jim@cado-oregon.org</p>	<p>SUSAN K ACKERMAN NIPPC PO BOX 10207 PORTLAND OR 97296-0207 susan.k.ackerman@comcast.net</p>
<p>GRIEG ANDERSON 5919 W MILES ST. PORTLAND OR 97219</p>	<p>KEN BEESON EUGENE WATER & ELECTRIC BOARD 500 EAST FOURTH AVENUE EUGENE OR 97440-2148 ken.beeson@eweb.eugene.or.us</p>
<p>JULIE BRANDIS ASSOCIATED OREGON INDUSTRIES 1149 COURT ST NE SALEM OR 97301-4030 jbrandis@aoi.org</p>	<p>KIM BURT WEST LINN PAPER COMPANY 4800 MILL ST WEST LINN OR 97068 kburt@wlinpco.com</p>
<p>J LAURENCE CABLE CABLE HUSTON BENEDICT ET AL 1001 SW 5TH AVE STE 2000 PORTLAND OR 97204-1136 lcable@chbh.com</p>	<p>MICHAEL CARUSO 176 SW HEMLOCK DUNDEE OR 97115 carusodad@hotmail.com</p>
<p>JENNIFER CHAMBERLIN STRATEGIC ENERGY LLC 2633 WELLINGTON COURT CLYDE CA 94520 jchamberlin@sel.com</p>	<p>WILLIAM H CHEN CONSTELLATION NEWENERGY INC 2175 N CALIFORNIA BLVD STE 300 WALNUT CREEK CA 94596 bill.chen@constellation.com</p>
<p>JOAN COTE OREGON ENERGY COORDINATORS ASSOCIATION 2585 STATE ST NE SALEM OR 97301 cotej@mwvcaa.org</p>	<p>CHRIS CREAN MULTNOMAH COUNTY 501 SE HAWTHORNE, SUITE 500 PORTLAND OR 97214 christopher.d.crean@co.multnomah.or.us</p>
<p>MELINDA J DAVISON DAVISON VAN CLEVE PC 1000 SW BROADWAY STE 2460 PORTLAND OR 97205 mail@dvclaw.com</p>	<p>JIM DEASON CABLE HUSTON BENEDICT HAAGENSEN & LLOYD LLP 1001 SW FIFTH AVE STE 2000 PORTLAND OR 97204-1136 jdeason@chbh.com</p>
<p>JAMES DITTMER UTILITECH INC 740 NW BLUE PKWY STE 204 LEE'S SUMMIT MO 64086 jdittmer@utilitech.net</p>	<p>J JEFFREY DUDLEY PORTLAND GENERAL ELECTRIC 121 SW SALMON ST 1WTC1301 PORTLAND OR 97204 jay_dudley@pgn.com</p>
<p>GARY DUELL 11301 SE CHARVIEW COURT CLACKAMAS OR OR 97015</p>	<p>JASON EISDORFER CITIZENS' UTILITY BOARD OF OREGON 610 SW BROADWAY STE 308</p>

<p>CLACKAMAS, OR OR 97015 gduell@bigplanet.com</p>	<p>610 SW BROADWAY STE 308 PORTLAND OR 97205 jason@oregoncub.org</p>
<p>JAMES F FELL STOEL RIVES LLP 900 SW 5TH AVE STE 2600 PORTLAND OR 97204-1268 jffell@stoel.com</p>	<p>ANN L FISHER AF LEGAL & CONSULTING SERVICES 1425 SW 20TH STE 202 PORTLAND OR 97201 energlaw@aol.com</p>
<p>ANDREA FOGUE LEAGUE OF OREGON CITIES PO BOX 928 1201 COURT ST NE STE 200 SALEM OR 97308 afogue@orcities.org</p>	<p>SCOTT FORRESTER FRIENDS OF THE CLACKAMAS RIVER 2030 NW 7TH PL GRESHAM OR 97030 clackamas9@aol.com</p>
<p>KATHERINE FUTORNICK 14800 NE BLUEBIRD HILL LANE DAYTON OR 97114 futork@onlinemac.com</p>	<p>LORA GARLAND L-7 BONNEVILLE POWER ADMINISTRATION P.O. BOX 3621 PORTLAND OR 97208-3621 lmgarland@bpa.gov</p>
<p>LEONARD GIRARD 2169 SW KINGS COURT PORTLAND OR 97205 lgirard@teleport.com</p>	<p>ANN ENGLISH GRAVATT RENEWABLE NORTHWEST PROJECT 917 SW OAK - STE 303 PORTLAND OR 97205 ann@rnp.org</p>
<p>PATRICK G HAGER PORTLAND GENERAL ELECTRIC 121 SW SALMON ST 1WTC0702 PORTLAND OR 97204 patrick_hager@pgn.com</p>	<p>ROY HENDERSON PENSION ENHANCEMENT COMMITTEE 895 NW DALE AVENUE PORTLAND OR 97229 royhensn@msn.com</p>
<p>MARY ANN HUTTON CANON AND HUTTON 9999 NE WORDEN HILL RD DUNDEE OR 97115-9147 mah@canonandhutton.com</p>	<p>JOE JANSSENS PGE PENSION ENHANCEMENT COMMITTEE 24495 BUTTEVILLE RD NE AURORA OR 97002 osprey64@juno.com</p>
<p>VALARIE KOSS COLUMBIA RIVER PUD PO BOX 1193 SAINT HELENS OR 97051 vkoss@crpud.org</p>	<p>GEOFFREY M KRONICK LC7 BONNEVILLE POWER ADMINISTRATION PO BOX 3621 PORTLAND OR 97208-3621 gmkronick@bpa.gov</p>
<p>MICHAEL L KURTZ BOEHM, KURTZ & LOWRY 36 E 7TH ST STE 2110 CINCINNATI OH 45202 mkurtzlow@aol.com</p>	<p>ROCHELLE LESSNER LANE, POWELL, SPEARS, LUBERSKY LLP 601 SW 2ND AVE. STE. 2100 PORTLAND OR 97204 lessner@lanepowell.com</p>

<p>KEN LEWIS 2880 NW ARIEL TERRACE PORTLAND OR 97210 kl04@mailstation.com</p>	<p>STEVEN G LINS GLENDALE, CITY OF 613 E BROADWAY STE 220 GLENDALE CA 91206-4394 slins@ci.glendale.ca.us</p>
<p>JAMES MANION WARM SPRINGS POWER ENTERPRISES PO BOX 960 WARM SPRINGS OR 97761 j_manion@wspower.com</p>	<p>LLOYD K MARBET DON'T WASTE OREGON 19142 S BAKERS FERRY RD BORING OR 97009 marbet@mail.com</p>
<p>GORDON MCDONALD PACIFIC POWER & LIGHT 825 NE MULTNOMAH STE 800 PORTLAND OR 97232 gordon.mcdonald@pacificorp.com</p>	<p>DANIEL W MEEK DANIEL W MEEK ATTORNEY AT LAW 10949 SW 4TH AVE PORTLAND OR 97219 dan@meek.net</p>
<p>THAD MILLER OREGON ELECTRIC UTILITY COMPANY 222 SW COLUMBIA STREET, SUITE 1850 PORTLAND OR 97201-6618 tmiller6@optonline.com</p>	<p>WILLIAM MILLER IBEW 17200 NE SACRAMENTO PORTLAND OR 97230 bill@ibew125.com</p>
<p>CHRISTY MONSON LEAGUE OF OREGON CITIES 1201 COURT ST. NE STE. 200 SALEM OR 97301 cmonson@orcities.org</p>	<p>MICHAEL MORGAN TONKON TORP LLP 888 SW 5TH AVE STE 1600 PORTLAND OR 97204-2099 mike@tonkon.com</p>
<p>FRANK NELSON 543 WILLAMETTE CT MCMINNVILLE OR 97128 fnelson@viclink.com</p>	<p>NANCY NEWELL 3917 NE SKIDMORE PORTLAND OR 97211 ogec2@hotmail.com</p>
<p>JAMES NOTEBOOM KARNOPP PETERSEN NOTEBOOM ET AL 1201 NW WALL ST STE 300 BEND OR 97701 jdn@karnopp.com</p>	<p>LISA F RACKNER ATER WYNNE LLP 222 SW COLUMBIA ST STE 1800 PORTLAND OR 97201-6618 lfr@aterwynne.com</p>
<p>DONALD W SCHOENBECK REGULATORY & COGENERATION SERVICES INC 900 WASHINGTON ST STE 780 VANCOUVER WA 98660-3455 dws@r-c-s-inc.com</p>	<p>REBECCA SHERMAN HYDROPOWER REFORM COALITION 320 SW STARK STREET, SUITE 429 PORTLAND OR 97204 northwest@hydroreform.org</p>
<p>JOHN W STEPHENS ESLER STEPHENS & BUCKLEY 888 SW FIFTH AVE STE 700 PORTLAND OR 97204-2021 jstephens@eslerstephens.com</p>	<p>BRETT SWIFT AMERICAN RIVERS 320 SW STARK ST, SUITE 418 PORTLAND OR 97204 bswift@amrivers.org</p>

<p>MITCHELL TAYLOR ENRON CORPORATION PO BOX 1188 1221 LAMAR - STE 1600 HOUSTON TX 77251-1188 mitchell.taylor@enron.com</p>	<p>LAURENCE TUTTLE CENTER FOR ENVIRONMENTAL EQUITY 610 SW ALDER #1021 PORTLAND OR 97205 nevermined@earthlink.net</p>
<p>S BRADLEY VAN CLEVE DAVISON VAN CLEVE PC 1000 SW BROADWAY STE 2460 PORTLAND OR 97205 mail@dvclaw.com</p>	<p>BENJAMIN WALTERS CITY OF PORTAND - OFFICE OF CITY ATTORNEY 1221 SW 4TH AVE - RM 430 PORTLAND OR 97204 bwalters@ci.portland.or.us</p>
<p>MICHAEL T WEIRICH DEPARTMENT OF JUSTICE 1162 COURT ST NE SALEM OR 97301-4096 michael.weirich@state.or.us</p>	<p>STEVEN WEISS NORTHWEST ENERGY COALITION 4422 OREGON TRAIL CT NE SALEM OR 97305 steve@nwenergy.org</p>
<p>ROBIN WHITE PORTLAND BOMA 1211 SW 5TH AVE STE 2722-MEZZANINE PORTLAND OR 97201 rwhite@bigplanet.com</p>	<p>LORNE WHITTLES EPCOR MERCHANT & CAPITAL (US) INC 1161 W RIVER ST STE 250 BOISE ID 83702 lwhittles@epcor.ca</p>
<p>LINDA K WILLIAMS KAFOURY & MCDUGAL 10266 SW LANCASTER RD PORTLAND OR 97219-6305 linda@lindawilliams.net</p>	