

1 **BEFORE THE OREGON PUBLIC UTILITIES COMMISSION**

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3 **DR 10/UE 88/UM 989**
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5 **In the Matters of:**
6 **Various Applications regarding**
7 **Acquire Portland General Electric**
8 **Co.**

MOTION TO COMPEL PGE
ANSWERS TO THIRD DISCOVERY
REQUEST TO PGE BY UTILITY
REFORM PROJECT

June 29, 2005

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11 On May 9, URP propounded its third set of discovery requests to PGE. Among the
12 requests to which PGE provided completely inadequate responses was:

13 **REQUEST NO. 9**

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15 Please state, separately for each of the years 1995, 1996, 1997, 1998,
16 1999, 2000, 2001, 2002, 2003, and 2004:

- 17
18 A. PGE's authorized rate of return on common equity;
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20 B. PGE's authorized rate of return on ratebase (equity plus debt);
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22 C. The actual rate of return PGE earned on common equity;
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24 D. The actual rate of return PGE earned on ratebase.

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26 For items C and D above, please provide all calculations that produced the
27 result and show how the result compares with the figures reported in the
28 corresponding FERC-1 Annual Report and Oregon Supplement.

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30 PGE failed to provide even a minimally adequate response to this request. The
31 response entirely failed to state the actual rate of return PGE earned on common
32 equity or on ratebase for any of the years.

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CERTIFICATE OF SERVICE

I hereby certify that I served a true copy of the foregoing MOTION TO COMPEL PGE ANSWERS TO THIRD DISCOVERY REQUEST TO PGE BY UTILITY REFORM PROJECT by email to the email addresses shown below, which comprise the service list on the Commission's web site as of this day.

| | |
|--|---|
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Dated: June 29, 2005

Daniel W. Meek