

October 6, 2005

Via Electronic Filing and U.S. Mail

Oregon Public Utility Commission
Attention: Filing Center
PO Box 2148
Salem OR 97308-2148

Re: In the Matter of PORTLAND GENERAL ELECTRIC
2006 Integrated Resource Plan
OPUC Docket No. LC _____

Attention Filing Center:

Enclosed for filing in the above-captioned docket is Portland General Electric's Motion for Extension of Time to File Integrated Resource Plan and for Clarification of Integrated Resource Plan Filing Requirement. This document is being filed by electronic mail with the Filing Center.

An extra copy of this cover letter is enclosed. Please date stamp the extra copy and return it to me in the envelope provided.

Thank you in advance for your assistance.

Sincerely,

/S/ J. RICHARD GEORGE FOR
V. DENISE SAUNDERS

VDS:am

cc: LC 33 Service List
UM 1056 Service List

Enclosure

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

LC _____

In the Matter of
PORTLAND GENERAL ELECTRIC
2006 Integrated Resource Plan

Motion of Portland General Electric
Company for Clarification of Integrated
Resource Plan Filing Requirement or in the
alternative for Extension of Time to File
Integrated Resource Plan

Pursuant to Commission Order 89-507, Portland General Electric Company (“PGE”) requests that the Public Utility Commission of Oregon (“Commission”) issue a Supplemental Order clarifying that its current least cost planning requirements permit PGE to file its next integrated resource plan (“IRP”) by December 31, 2006. In the alternative, PGE requests a Supplemental Order granting PGE an extension of time to permit it to file its next IRP by December 31, 2006.

I. The Commission’s Requirements

The Commission’s least cost planning requirements are set forth in Order No. 89-507 (“Order”). The Order requires least cost plans¹ to be “updated by the utilities no less frequently than every two years.” Order, p. 11. The Order does not indicate from which point the two year period is calculated. In other words, it is not clear whether least cost plans are to be updated two years from the time the last plan was submitted, two years from the time the last plan was acknowledged, or two years from some other event.

¹ The terms “least cost plan” and “integrated resource plan” are used interchangeably throughout this motion.

Given the lack of clarity in the Order and the history of PGE's last IRP, it is not clear when PGE is required to file its next plan. The Order provides that parties may request supplemental orders at any time for the purpose of clarifying or modifying the Commission's directives. *Id. at p. 6.*

II. PGE's Last IRP

PGE filed its last least cost plan, its 2002 Integrated Resource Plan (IRP), on August 9, 2002. Review, subsequent analysis, and approval of PGE's plan took nearly two years. During those two years, PGE conducted numerous workshops, responded to approximately one hundred data requests, submitted a Supplemental Action Plan in 2003, conducted an RFP, and submitted a Final Action Plan on March 26, 2004. On July 20, 2004, the Commission issued Order 04-375 acknowledging PGE's 2002 Integrated Resource Final Action Plan with an exception and conditions².

Given the chronology of PGE's last IRP process, it seems evident that PGE would not have been expected to file a new plan two years after submittal of its last plan, as that would have required filing one month after its last plan had been acknowledged. However, it is not clear whether the Commission expects PGE to file two years from the filing date of its Final Action Plan, two years from the acknowledgement date, or two years from execution of the chief action items of PGE's plan acknowledgement.

² In its Order, the Commission appeared to anticipate that PGE would be filing an IRP in 2005. For example, it required PGE to include an action item in its 2005 IRP to address how it will work with BPA and others to develop transmission capacity over the Cascades so that additional wind (and other) resources are accessible to PGE at a reasonable price.

III. PGE's Request

PGE believes that filing its next IRP earlier than late 2006 would be premature. A 2006 filing will provide sufficient time for PGE to implement the action plan acknowledged by the Commission before it undertakes a new IRP process. It should also allow PGE to conduct its next IRP under any new least cost planning guidelines developed in Docket UM 1056. In the interim, PGE will commit to provide the Commission, before the end of the first quarter of 2006, with an update of its progress in implementing its current action plan and an assessment of any changes that have occurred since the action plan was acknowledged.

IV. Conclusion

Accordingly, for the reasons discussed above, PGE requests that the Commission clarify that PGE's next IRP should be filed by December 31, 2006 or, alternatively, grant PGE an extension of time permitting it to file its IRP by that date.

DATED this 6th day of October, 2005.

Respectfully submitted,

/S/ J. RICHARD GEORGE FOR
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CERTIFICATE OF SERVICE

I hereby certify that on this day I served the foregoing **MOTION OF PGE FOR EXTENSION OF TIME AND CLARIFICATION** by First Class US Mail, postage prepaid and properly addressed, and by electronic mail where such addresses were available, upon each party on the attached combined service lists of OPUC Dockets LC 33 and UM 1056.

DATED: October 6, 2005.

/S/ J. RICHARD GEORGE

J. Richard George

LC 33 / UM 1056
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