



Portland General Electric Company
Legal Department
121 SW Salmon Street • Portland, Oregon 97204
(503) 464-8926 • Facsimile (503) 464-2200

Douglas C. Tingey
Assistant General Counsel

March 13, 2007

Via Electronic Filing and U.S. Mail

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

Re: UE 180, 181 AND 184

Attention Filing Center:

Enclosed for filing in the captioned dockets are an original and one copy of:

- **PORTLAND GENERAL ELECTRIC'S MOTION FOR AMENDMENT OF COMMISSION FINAL ORDER.**

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,

A handwritten signature in black ink, appearing to read "DCT", is written over a light gray circular stamp.

DOUGLAS C. TINGEY

DCT:jbf
Enclosure

cc: Service Lists – UE 180, 181, and 184

BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

UE 180/ UE 181/ UE 184

In the Matter of)	
PORTLAND GENERAL ELECTRIC)	
COMPANY)	
)	
Request for a General Rate Revision (UE 180),)	
_____)	
)	PORTLAND GENERAL
In the Matter of)	ELECTRIC COMPANY'S
PORTLAND GENERAL ELECTRIC)	MOTION FOR AMENDMENT
COMPANY)	OF COMMISSION FINAL
)	ORDER
Annual Adjustments to Schedule 125 (2007)	
RVM Filing) (UE 181),)	
_____)	
)	
In the Matter of)	
)	
PORTLAND GENERAL ELECTRIC)	
COMPANY)	
)	
Request for a General Rate Revision relating to)	
the Port Westward Plant (UE 184).)	
_____)	

Pursuant to ORS §756.568 Portland General Electric Company (“PGE”) moves for amendment to Order 07-015, the Commissions’ final order issued in this docket. In the alternative, PGE requests reconsideration of that order pursuant to ORS §756.561. In this motion PGE requests amendment only of the portions of the order dealing with the operational date of the Port Westward plant by moving the required filing date two days.¹ PGE has

¹ PGE currently expects Port Westward to be commercially operational before April 30, 2007. PGE is filing this motion as a cautionary measure in case there are unforeseen delays in these final days of construction.

discussed this motion with Staff, the Citizens' Utility Board ("CUB") and the Industrial Customers of Northwest Utilities ("ICNU"), and none of those parties object to PGE's request to move the date two days.

DISCUSSION

One of the issues decided in this rate case was implementation of certain conditions proposed for recovery of Port Westward costs. One of those conditions dealt with the possibility of a delay in the operational date of the plant. A condition suggested by the CUB was: "[t]he tariff associated with Port Westward should only be valid within 30 days of March 1, 2007." *Order 07-015*, p. 50. PGE acknowledged CUB's concerns, but suggested that if the Commission adopted CUB's conditions, the Commission should allow three months before reopening this docket. *Id.* The Commission's resolution, also on page 50 of the order, states in pertinent part:

To allow flexibility for PGE, we conclude that the decisions in this consolidated case will prevail, as long as Port Westward becomes operational within 60 days of the estimated March 1, 2007, online date. If Port Westward becomes operational on or after April 30, and before September 1, 2007, Staff and intervenors will have 15 days from the online date to determine whether there is new information that requires a re-examination of PGE's costs in rates.

On page 55 of the order, under the heading "Order", is the following:

PGE shall file revised tariffs consistent with the findings of fact and conclusions of law contained in this order related to Port Westward no earlier than March 1, 2007, and no later than April 30, 2007. The filing must include attestation by a PGE corporate officer that Port Westward's operational testing has been completed and the plant has been released to the system dispatcher for full communal operation.

PGE requests that the Commission change the date for filing revised tariffs from April 30, 2007, to May 2, 2007. As set out in the testimony of Stephen Quennoz and Stephen Schue, PGE 300 in this docket, Black & Veatch Construction, Inc. ("Black & Veatch") is the Engineering, Procurement and Construction contractor for Port Westward. The Black & Veatch contract has a guaranteed completion date of May 1, 2007, and Black & Veatch must pay

liquidated damages if the work is not completed by that date. *PGE 300*, p. 47. Specifically, to meet Black & Veatch's guaranteed completion date, the plant must be completed, ready for commercial operation, turned over to and accepted by PGE by 11:59 p.m. on May 1, 2007. Moving the Port Westward tariff filing deadline to May 2 will align the regulatory completion date with the contractual guaranteed completion date. If the plant is completed and turned over to PGE on May 1, 2007, PGE will be able to file the attestation required by the Order, along with revised tariffs, on May 2, 2007. Aligning the dates will also align the interests of PGE and Black & Veatch in bringing the plant on line. As stated above, Staff, CUB and ICNU do not object to this minor amendment to the order.

CONCLUSION

For the reasons stated above PGE requests that page 50 and Ordering Paragraph 4 in Order 07-015 be amended, moving the date for PGE to file attestation that Port Westward is operational, and revised tariffs, from April 30, 2007, to May 2, 2007.

DATED this 13th day of March, 2007

Respectfully submitted,

/s/ DOUGLAS C. TINGEY

DOUGLAS C. TINGEY, OSB No. 04436
Portland General Electric Company
121 SW Salmon Street, 1WTC1300
Portland, OR 97204
Telephone: (503) 464-8926
Facsimile: (503) 464-2200
E-Mail: doug.tingey@pgn.com

CERTIFICATE OF SERVICE

I hereby certify that I have this day caused **PORTLAND GENERAL ELECTRIC'S MOTION FOR AMENDMENT OF COMMISSION FINAL ORDER** to be served by electronic mail to those parties whose email addresses appear on the attached service list, and by First Class US Mail, postage prepaid and properly addressed, to those parties on the attached service list who have not waived paper service.

Dated at Portland, Oregon, this 13th day of March 2007.

/S/ DOUGLAS C. TINGEY

DOUGLAS C. TINGEY

SERVICE LIST

UE 180, UE 181, UE 184

KURT J BOEHM, ATTORNEY
BOEHM KURTZ & LOWRY
36 E 7th ST - STE 1510
CINCINNATI OH 45202
kboehm@bkllawfirm.com

MICHAEL L KURTZ
BOEHM KURTZ & LOWRY
36 E 7TH ST STE 1510
CINCINNATI OH 45202-4454
mkurtz@bkllawfirm.com

GEOFFREY M KRONICK
BONNEVILLE POWER
ADMINISTRATION
PO BOX 3621 LC7
PORTLAND OR 97208-3621
gmkronick@bpa.gov

CRAIG SMITH
BONNEVILLE POWER
ADMINISTRATION
PO BOX 3621--L7
PORTLAND OR 97208-3621
cmsmith@bpa.gov

JAMES T SELECKY
BRUBAKER & ASSOCIATES, INC.
1215 FERN RIDGE PKWY, SUITE 208
ST. LOUIS MO 63141
jtselecky@consultbai.com

TAMARA FAUCETTE
CABLE HUSTON BENEDICT
HAAGENSEN & LLOYD LLP
1001 SW 5TH AVE STE 2000
PORTLAND OR 97204
tfaucette@chbh.com

CHAD M STOKES
CABLE HUSTON BENEDICT
HAAGENSEN & LLOYD, LLP
1001 SW 5TH - STE 2000
PORTLAND OR 97204
cstokes@chbh.com

EDWARD A. FINKLEA
CABLE HUSTON BENEDICT
HAAGENSEN & LLOYD, LLP
1001 SW 5TH - STE 2000
PORTLAND OR 97204
efinklea@chbh.com

LOWREY R BROWN
CITIZENS' UTILITY BOARD OF
OREGON
610 SW BROADWAY - STE 308
PORTLAND OR 97205
lowrey@oregoncub.org

JASON EISDORFER
CITIZENS' UTILITY BOARD OF
OREGON
610 SW BROADWAY STE 308
PORTLAND OR 97205
dockets@oregoncub.org

JIM ABRAHAMSON, COORDINATOR
COMMUNITY ACTION DIRECTORS
OF OREGON
PO BOX 7964
SALEM OR 97303-0208
jim@cado-oregon.org

S BRADLEY VAN CLEVE
DAVISON VAN CLEVE PC
333 SW TAYLOR - STE 400
PORTLAND OR 97204
mail@dvclaw.com

STEPHANIE S ANDRUS
ASSISTANT ATTORNEY GENERAL
DEPARTMENT OF JUSTICE
REGULATED UTILITY & BUSINESS
SECTION
1162 COURT ST NE
SALEM OR 97301-4096
stephanie.andrus@state.or.us

LAURA BEANE MANAGER
PACIFICORP
825 MULTNOMAH STE 2000
PORTLAND OR 97232-2153
laura.beane@pacificorp.com

ANN L. FISHER
AF LEGAL & CONSULTING SERVICES
PO Box 25302
PORTLAND, OR 97298-0302
energlaw@aol.com

LORNE WHITTLES
EPCOR MERCHANT CAPITAL
1161 W. RIVER STREET, SUITE 250
BOISE, IDAHO 83702
lwhittles@epcor.ca

ELISA M. LARSON
ASSOCIATE COUNSEL
NORTHWEST NATURAL
220 NW 2ND AVENUE
PORTLAND, OREGON 97209
elisa.larson@nwnatural.com

ALEX MILLER
NORTHWEST NATURAL
220 NW SECOND AVENUE
PORTLAND, OREGON 97209-3991
alex.miller@nwnatural.com

BENJAMIN WALTERS
(waived paper service)
bwalters@ci.portland.or.us

RICHARD GRAY
(waived paper service)
richard.gray@pdxtrans.org

DAVID TOOZE
(waived paper service)
dtooze@ci.portland.or.us

SCOTT H. DEBROFF
RIVER CHASE OFFICE CENTER
4431 NORTH FRONT STREET
HARRISBURG, PA 17110
sdebroy@sasllp.com

WILLIAM H. CHEN
CONSTELLATION NEWENERGY INC.
2175 N. CALIFORNIA BLVD.
SUITE 300
WALNUT CREEK, CA 94596
bill.chen@constellation.com

DANIEL W. MEEK
DANIEL W. MEEK ATTORNEY AT LAW
10949 SW 4th AVENUE
PORTLAND, OR 97219
dan@meek.net

THEODORE E ROBERTS
SEMPRA GLOBAL
101 ASH ST HQ 13D
SAN DIEGO CA 92101-3017
troberts@sempra.com

LINDA WRAZEN
SEMPRA GLOBAL
101 ASH ST, HQ8C
SAN DIEGO CA 92101-3017
lwrazen@sempraglobal.com

KATHERINE A MCDOWELL
MCDOWELL & RACKNER
520 SW 6TH AVENUE
SUITE 830
PORTLAND, OREGON 97204
katherine@mcd-law.com

JIM DEASON
1 SW COLUMBIA STREET
SUITE 1600
PORTLAND, OREGON 97258-2014
jimdeason@comcast.net

ROBERT VALDEZ
PO BOX 2148
SALEM, OR 97308-2148
bob.valdez@state.or.us

LINDA K. WILLIAMS
KAFOURY AND MCDOUGAL
10266 SW LANCASTER ROAD
PORTLAND, OR 97219-6305
Linda@lindawilliams.net

ANDREA FOGUE
SENIOR STAFF ASSOCIATE
LEAGUE OF OREGON CITIES
PO BOX 928
1201 COURT STREET NE, SUITE 200
SALEM, OR 97308
afogue@orcities.org

LON L. PETERS
(waived paper service)
lpeters@pacifier.com

HARVARD P. SPIGAL
PRESTON GATES AND ELLIS
222 SW COLUMBIA STREET
SUITE 1400
PORTLAND, OREGON 97201-6632
hspigal@prestongates.com

DAVID R. RIS, SR. ASST CITY
ATTORNEY
CITY OF GRESHAM
1333 NW EASTMAN PARKWAY
GRESHAM, OR 97030
david.ris@ci.gresham.or.us

JOHN HARRIS
TRANSPORTATION OPERATIONS
CITY OF GRESHAM
1333 NW EASTMAN PARKWAY
GRESHAM, OR 97030
john.harris@ci.gresham.or.us

JUDY JOHNSON
PUBLIC UTILITY COMMISSION
PO BOX 2148
SALEM, OR 97204