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September 8, 2008

Via Electronic and U.S. Mail

Public Utility Commission
Attn: Filing Center
550 Capitol St. NE #215
P.O. Box 2148
Salem, OR 97308-2148

Re: In the Matter of PORTLAND GENERAL ELECTRIC COMPANY's
Request for a General Rate Revision
Docket No. UE 197

Dear Filing Center:

Enclosed please find the original Expedited Motion to Modify the Schedule on behalf of the Industrial Customers of Northwest Utilities in the above-referenced docket. Thank you for your attention to this matter.

Sincerely yours,

/s/ Allison M. Wils
Allison M. Wils

Enclosures

cc: Service List

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have this day served the foregoing Expedited Motion to Modify the Schedule on behalf of the Industrial Customers of Northwest Utilities upon the parties, on the service list, by causing the same to be deposited in the U.S. Mail, postage-prepaid, where paper service has not been waived.

Dated at Portland, Oregon, this 8th day of September, 2008.

/s/ Allison M. Wils

Allison M. Wils

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**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UE 197

In the Matter of)	
)	
PORTLAND GENERAL ELECTRIC COMPANY)	ICNU's Expedited Motion to Modify Schedule
)	
Request for a General Rate Revision)	
_____)	

Pursuant to OAR § 860-013-0031, the Industrial Customers of Northwest Utilities (“ICNU”) submits this Expedited Motion to Modify the Schedule in Public Utility Commission of Oregon (“OPUC” or the “Commission”) Docket No. UE 197. ICNU respectfully requests that ALJ Arlow rule on this motion by Wednesday, September 10, 2008. ICNU requests that the due date for Staff and Intervenor Surrebuttal Testimony be moved by two business days from September 11, 2008, to September 15, 2008, and that the due date for PGE’s Sursurrebuttal Testimony, be moved from September 30, 2008, to October 1, 2008. In addition, ICNU requests that the time for responding to all data requests following the Surrebuttal Testimony be clarified such that the in-hand due date for all data responses (including confidential attachments) is five business days from receipt of the data request.

ICNU needs the additional time to review recently produced data responses to complete its Surrebuttal Testimony^{1/}. ICNU contacted representatives of Portland General Electric Company (“PGE” or the “Company”), and PGE agreed to above described changes to

^{1/} ICNU did not receive the complete responses from PGE until today, even though these were due on September 5, 2008.

the schedule and the response time for data requests. ICNU also contacted, OPUC Staff, the Citizens' Utility Board ("CUB"), and all other parties on the service list in this proceeding. Kroger and Staff support this motion. CUB, Community Action Partnership of Oregon, and the Department of Energy do not oppose this motion. ICNU does not request modification of any other dates in the schedule.

Good cause exists to modify the schedule to allow parties to complete discovery and draft testimony. In addition, PGE did not provide a complete set of its discovery responses until today, depriving ICNU's witness three key days to prepare her testimony. PGE disagrees with this contention and believes that their data responses were timely. Providing the parties additional time to complete their testimony will facilitate the development of the most comprehensive record possible in this Docket. In addition, no party objects to this request.

WHEREFORE, ICNU respectfully requests that the Administrative Law Judge grant this Expedited Motion to Modify Schedule and change the schedule as follows:

Surrebuttal Testimony	September 15, 2008
Settlement Conference	9:30 am, September 22, 2008
Sursurrebutal Testimony	October 1, 2008
Data Responses after 9/15	Must be delivered by 5 business days after receipt

Dated this 8th day of September, 2008.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Melinda J. Davison

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