

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UE 197

In the Matter of)	
)	
PORTLAND GENERAL ELECTRIC,)	CUB's REQUEST TO ALLOW
)	BRIEF IN EXCESS OF FIFTY
Request for a general rate revision.)	PAGES AND WITHOUT
)	COMPLETE ADDRESS
)	
)	
)	
_____)	

The Citizens' Utility Board of Oregon (CUB) asks that the Administrative Law Judge ("ALJ") allow submission of a brief in excess of 50 pages. The administrative rule governing submission of written argument does not include a page limit. However, a page limit is found on the Commission's website under the page titled "Tips on PUC Practice and Procedures." A paragraph found on that page specifies that no brief should exceed 50 pages, unless the presiding ALJ grants permission otherwise.

Counsel for CUB was not aware of this limitation until after she filed the CUB Opening Brief in this matter. The CUB Opening Brief is 55 pages long. CUB asks that the ALJ allow submission of a brief that exceeds 50 pages because the issues presented in this case are complex; several hundreds of pages of testimony and exhibits were presented on these issues. Further, CUB believes that the Commission and parties are benefited by a complete discussion of the issues presented in this case.

CUB further requests that the ORCP Rule 17A requirement that the party's complete address appear on the face of the pleading be waived. All parties to this matter are very familiar with CUB and its contact information and CUB believes that no prejudice has been caused to the Commission or any party by this omission.

DATED this 28th day of October, 2008

Respectfully Submitted,

A handwritten signature in black ink, appearing to read 'G. C. M.', written in a cursive style.

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UE 197 – CERTIFICATE OF SERVICE

I hereby certify that, on this 28th day of October 2008, I served the foregoing Request to Allow Brief in Excess of Fifty Pages and Without Complete Address of the Citizens' Utility Board of Oregon upon all parties of record in this proceeding by delivering a copy by electronic mail, and by mailing a copy by postage prepaid first class mail or by hand delivery to the parties accepting paper service.

Respectfully submitted,



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