



**Portland General Electric Company**  
*Legal Department*  
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**Douglas C. Tingey**  
*Associate General Counsel*

July 16, 2018

***Via Electronic Filing***

Public Utility Commission of Oregon  
Attention: Filing Center  
P.O. Box 1088  
Salem, OR 97308-1088

**Re: UE 335 - PORTLAND GENERAL ELECTRIC COMPANY, Request for a General Rate Revision**

Dear Filing Center:

Enclosed for filing in the above-referenced docket are Portland General Electric Company's Motion to Accept Filing of Reply Testimony, expedited consideration requested, and Affidavit of Stefan Brown in Support.

Thank you for your assistance.

Sincerely,

A handwritten signature in blue ink, appearing to read "DCT", is written over the typed name of Douglas C. Tingey.

Douglas C. Tingey  
Associate General Counsel

DCT:hp  
Enclosures

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF THE STATE OF OREGON**

**UE 335**

In the Matter of  
  
PORTLAND GENERAL ELECTRIC  
COMPANY,  
  
Request for a General Rate Revision.

**MOTION TO ACCEPT FILING OF  
REPLY TESTIMONY**

***EXPEDITED CONSIDERATION  
REQUESTED***

Pursuant to OAR 860-001-0000(2), Portland General Electric Company (“PGE”) hereby moves the Administrative Law Judge (“ALJ”) for an order allowing the filing of PGE’s Reply testimony in this case to be considered timely filed. PGE filed a cover letter for the testimony with the Commission on Friday, July 13, 2018. PGE provided the other parties in this docket with electronic copies of the Reply testimony on the due date, Friday, July 13, 2018. However, copies were not received by the Commission filing center until Monday, July 16, 2018.

PGE’s Reply testimony consists of 11 pieces of testimony, PGE Exhibits 1500 to 2500. Pursuant to the procedural schedule in this docket, this testimony was to be filed on July 13, 2018. On July 13, 2018, PGE provided copies of the testimony, exhibits, and workpapers, including confidential portions, to the other parties by posting the information to the Huddle site used for this docket. PGE’s cover letter, filed with the Commission, indicated that it had done this. The parties were also given notice through the Huddle website that the documents had been posted. PGE intended to have copies of the filing, including confidential portions, delivered to the Commission on Friday, but Friday afternoon was informed that the courier for the package could not deliver the package on time.<sup>1</sup> As a result, the documents were not delivered to the

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<sup>1</sup> These facts are supported by the Affidavit of Stefan Brown submitted herewith.

Commission until today, July 16. Electronic versions, without the confidential material, were also provided to the Commission today. PGE apologizes for its error.

OAR 860-001-0000(2) states:

For limited purposes in specific proceedings, the Commission or ALJ may modify or waive any of the rules in this division for good cause shown. A request for exemption must be made in writing, unless otherwise allowed by the Commission of ALJ.

OAR 860-001-0150 addresses filing dates. Subsection (4) of that rule states:

Documents required to be filed within a specified time but that fail to substantially comply with these rules may be accepted as conditionally received to meet the filing deadline.

Subsection (5) further states:

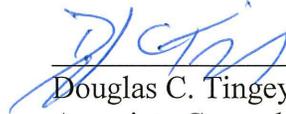
Conditionally received filings are not considered officially filed until brought into substantial compliance with these rules, the Commission's orders, ALJ rulings, and statutes.

To the extent necessary in these circumstances, PGE requests that the ALJ conditionally accept the filings as timely on Friday, and as completed today, July 16, 2018. Again, PGE apologizes for making an incomplete filing by this deadline. PGE believes, however, that there has been no harm to the process and the other parties' ability to read and respond to the Reply testimony filed in this docket. The parties had access to the testimony, and the confidential exhibits thereto, on Friday. For these reasons, PGE seeks any waiver required under OAR 860-001-0000, for conditional timely acceptance of its reply testimony under OAR 860-001-0150, and for determination that PGE's filing has been brought into substantial compliance with the Commission rules. If the ALJ determines that the filing cannot be accepted as timely, then PGE requests waiver of the deadline in the schedule in this docket under these circumstances, and allow the filing to be submitted today.

PGE requests expedited consideration of this motion.

DATED this 16th day of July, 2018.

Respectfully submitted,



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**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**UE 335**

In the Matter of  
  
PORTLAND GENERAL ELECTRIC  
COMPANY,  
  
Request for a General Rate Revision.

**AFFIDAVIT OF STEFAN BROWN IN  
SUPPORT OF MOTION TO ACCEPT  
FILING OF REPLY TESTIMONY**

State of Oregon            )  
  ) ss.  
County of Multnomah    )

I, STEFAN BROWN, being first duly sworn on oath, depose and say:

1. My name is Stefan Brown. I am a Manager of Regulatory Affairs for Portland General Electric Company (“PGE”).

2. PGE’s Reply testimony in this docket consists of 11 pieces of testimony, with associated exhibits, some of which contain material designated as protected information under the Protective Order in this docket.

3. On Friday July 13, 2018, PGE filed with the Commission filing center a cover letter for the filing of its reply testimony and exhibits. That filing, however, erroneously did not include electronic versions of the testimony and exhibits.

4. PGE intended to have hard copies of the testimony, and CDs containing electronic copies of the confidential, and non-confidential exhibits, delivered to the Commission on Friday. However, by the time the hard copies were ready, the courier PGE had arranged was unable to deliver the copies to the Commission by the close of business on Friday. The hard copies, and CDs, were delivered to the Commission today, July 16, 2018.

5. On Friday PGE posted the 11 pieces of testimony, and confidential and non-confidential exhibits, to the Huddle website used for this docket. A notice to each party was provided through the Huddle site, and PGE's filing letter also indicated that the testimony had been posted to Huddle.

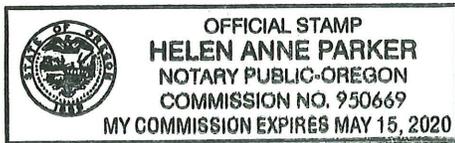
DATED this 16th day of July, 2018.



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Stefan Brown

SUBSCRIBED AND SWORN to before me this 16th day of July, 2018.



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Notary Public for Oregon  
My Commission Expires: 5-15-2020