

1 BEFORE THE PUBLIC UTILITY COMMISSION
2 OF OREGON
3

4 In the Matter of PORTLAND GENERAL
5 ELECTRIC COMPANY Application for an
6 Order Authorizing the Issuance of 62,500,000
7 Shares of New Common Stock Pursuant to
8 ORS 757.410 *et seq.*

Case Nos. UF 4218/UM 1206

and

JOINT MOTION BY CITY OF
PORTLAND AND APPLICANTS TO
EXTEND TIME FOR FILING CITY'S
DIRECT TESTIMONY

9 In the Matter of STEPHEN FORBES
10 COOPER, LLC, as Disbursing Agent, on
11 behalf of the RESERVE FOR DISPUTED
12 CLAIMS Application for an Order Allowing
13 the Reserve for Disputed Claims to Acquire
14 the Power to Exercise Substantial Influence
15 over the Affairs and Policies of Portland
16 General Electric Company Pursuant to ORS
17 757.511

15 The City of Portland and Applicants hereby request an extension of time for the City to
16 file its direct testimony in this case. Testimony is currently due on September 9, 2005. The City
17 and PGE request that the City be permitted to file its testimony on September 16, 2005.

18 As grounds for this motion, the City and Applicants state as follows:

19 The City has submitted data requests to PGE. Responses were due to the City on August
20 26. At the same time, Applicants and the City and other parties have been engaged in settlement
21 negotiations. The City has now advised the parties that it will not join the settlement that is
22 currently under consideration.

23 PGE is unable to respond to the City's data requests until September 2, 2005. The City
24 has agreed that PGE may have until that day to provide the information sought, conditioned on
25 the City itself receiving a similar extension of time, until September 16, to file its direct
26 testimony. Applicants support the City request for an extension of time, so that the City is not

1 prejudiced by PGE's delay in responding to the data requests.

2 The City and Applicants respectfully request that the City be permitted to file its direct
3 testimony on September 16, 2005.

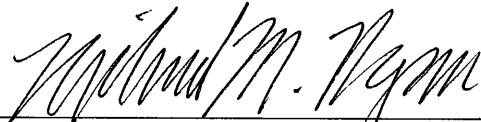
4 Dated this 29th day of August, 2005.

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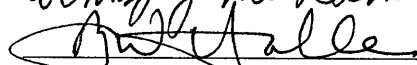
Respectfully submitted,



Benjamin Walters, OSB #85354
Senior Deputy City Attorney
Of Attorneys for City of Portland



Michael Morgan, OSB #72173
Tonkon Torp LLP
Of Attorneys for Applicant Stephen Forbes
Cooper, LLC *as Disbursing Agent - on
behalf of the Reserve & Disputed Claims*



Barbara Halle, OSB #88054
Portland General Electric Company
Of Attorneys for Applicant Portland General
Electric

1 CERTIFICATE OF SERVICE

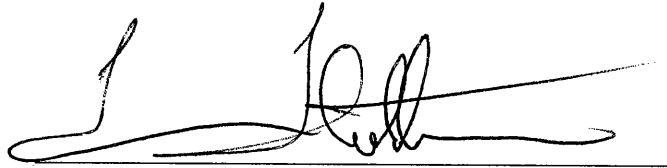
2 I hereby certify that I served a copy of the foregoing JOINT MOTION FOR EXTENSION
3 OF TIME TO FILE DIRECT TESTIMONY to:

4 PUC ADMINISTRATIVE HEARINGS DIVISION
5 550 CAPITOL STREET, NE, SUITE 215
6 SALEM OREGON 97310-2551
7 Fax No. (503) 378-6163

8 on the 29th day of August 29, 2005, by electronic copy to Case Manager, Bryan Conway, e-mail
9 address: bryan.conway@state.or.us and by mailing the original and five copies of said
10 document, contained in a sealed envelope with postage paid, and deposited in the post office at
11 Portland, Oregon on said day.

12 I further certify that I served a copy of the foregoing MOTION on the following Persons
13 by electronically mailing copies to the individuals on the attached Service List.

14 DATED this 29TH day of August, 2005.

15 

16 Terence Thatcher, OSB #84122
17 Deputy City Attorney
18 Of Attorneys for City of Portland

SERVICE LIST (UF 4218/UM 1206)

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