

October 21, 2005

Via Electronic Filing and U.S. Mail

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

Re: In the Matter of UTILITY REFORM PROJECT and KEN LEWIS
Application for Deferred Accounting
OPUC Docket No. UM 1224

Attention Filing Center:

Enclosed for filing in the above-captioned docket is Portland General Electric's Motion for Extension of Time to Respond to Application for Deferred Accounting. 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,

/s/ DOUGLAS C. TINGEY

DCT:am

cc: UM 1224 Service List

Enclosure

CERTIFICATE OF SERVICE

I hereby certify that I have this day caused the foregoing MOTION FOR EXTENSION OF TIME TO RESPOND TO APPLICATION FOR DEFERRED ACCOUNTING OF PORTLAND GENERAL ELECTRIC to be served by First Class US Mail, postage prepaid and properly addressed, and by electronic mail, upon the following parties from the official service list in Docket No. UM 1224:

DANIEL W MEEK
DANIEL W MEEK ATTORNEY AT LAW
10949 SW 4TH AVE
PORTLAND OR 97219
dan@meeek.net

Dated at Portland, Oregon, this 21st day of October, 2005.

/s/ DOUGLAS C. TINGEY
Douglas C. Tingey

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 1224

**In the Matter of UTILITY REFORM
PROJECT and KEN LEWIS Application
for Deferred Accounting**

**MOTION FOR EXTENSION OF TIME
TO RESPOND TO APPLICATION FOR
DEFERRED ACCOUNTING**

**[EXPEDITED CONSIDERATION
REQUESTED]**

Pursuant to OAR 860-013-0031, Portland General Electric (“PGE”) hereby moves the Public Utility Commission of Oregon (“Commission”) for an Extension of Time to file comments regarding the Application for Deferred Accounting (“Application”) in this docket. In support of this Motion PGE states as follows:

1. On October 5, 2005, the Utility Reform Project and Ken Lewis (“Applicants”) filed the subject Application with the Commission.
2. Applicants served on PGE a Notice of Application for Deferred Account concurrent with their Application for Deferred Account. Pursuant to OAR 860-027-0300(6)(d), that notice included a date by which “any person may submit to the Commission written comment on the application.” The rule requires that the date be “no sooner than 25 days from the date of the application”. The notice set the date for comments as November 1, 2005.
3. Due to the demands of other pending matters, PGE requests that the date for filing comments on the application be extended to November 10, 2005. PGE has contacted counsel for Applicants, and counsel has no objection to this extension. This new date complies with the requirements of OAR 860-027-0300(6). PGE further requests that any further proceedings in this docket be scheduled after receipt by the Commission of PGE’s initial comments.

4. Due to the short time before the comments are currently due, PGE requests expedited consideration of this motion.

5. For the reasons stated above, PGE requests that the deadline for PGE to file written comments on the Application be extended to November 10, 2005.

DATED this 21st day of October, 2005.

Respectfully submitted,

/s/ DOUGLAS C. TINGEY

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