

June 11, 2014

***VIA ELECTRONIC FILING
AND OVERNIGHT DELIVERY***

Oregon Public Utility Commission
3930 Fairview Industrial Dr. S.E.
Salem, OR 97302-1166

Attn: Filing Center

RE: UM 1670—Joint Motion to Amend Procedural Schedule

PacifiCorp d/b/a Pacific Power submits for filing an original and five copies of the joint motion of Complainant Columbia Basin Electric Cooperative, Inc., and Defendants Pacific Power, North Hurlburt Wind, LLC., South Hurlburt Wind, LLC., Horseshoe Bend Wind, LLC., and Caithness Shepherds Flat, LLC. to amend the procedural schedule of the above-referenced proceeding.

It is respectfully requested that all formal data requests to the Company regarding this filing be addressed to the following:

By e-mail (preferred): datarequest@pacificorp.com

By regular mail: Data Request Response Center
PacifiCorp
825 NE Multnomah, Suite 2000
Portland, OR 97232

Please direct any informal inquiries to Natasha Siores, Director of Regulatory Affairs & Revenue Requirement, at (503) 813-6583.

Sincerely,



R. Bryce Dalley
Vice President, Regulation

Enclosures

CERTIFICATE OF SERVICE

I certify that I served a true and correct copy of PacifiCorp's Joint Motion to Amend Procedural Schedule on the parties listed below via electronic mail and/or US mail in compliance with OAR 860-001-0180.

UM 1670

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Dated this 11th of June 2014.



Carrie Meyer
Supervisor, Regulatory Operations

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 1670

In the Matter of

COLUMBIA BASIN ELECTRIC
COOPERATIVE, INC.,

Complainant;

JOINT MOTION TO AMEND
PROCEDURAL SCHEDULE

v.

PACIFICORP d/b/a PACIFIC POWER,
NORTH HURLBURT WIND, LLC., SOUTH
HURLBURT WIND, LLC., HORSESHOE
BEND WIND, LLC., and CAITHNESS
SHEPHERDS FLAT, LLC.

Defendants.

Complainant Columbia Basin Electric Cooperative, Inc., and Defendants North Hurlburt Wind, LLC, South Hurlburt Wind, LLC, Horseshoe Bend Wind, LLC, Caithness Shepherds Flat, LLC,¹ and PacifiCorp d/b/a/ Pacific Power, (collectively, “the Parties”) respectfully ask the Commission to amend the procedural schedule. Under the current schedule, opening testimony is due on June 13, 2014, closing testimony is due on July 2, 2014, cross examination statements are due on July 9, 2014, prehearing briefs are due on July 21, 2009, and a hearing is set for July 29, 2014.² Opening briefs are due on August 22, 2014, and closing briefs are due on September 3, 2014.

The Parties have conferred and agree that the issues presented in this case are amendable to resolution by cross summary judgment motions. The Parties therefore propose to:

- (1) Strike the current deadlines for opening testimony, cross examination statements, prehearing briefs, and the hearing; and

¹ North Hulbert Wind, LLC, South Hulbert Wind LLC, and Horseshoe Bend Wind, LLC are collectively referred to herein as the “Caithness Parties.”

² Prehearing Conference Memorandum (Mar. 18, 2014).

(2) File cross summary judgment motions in lieu of prehearing briefs on August 22, 2014.

The Parties also agree that the deadline for filing cross summary judgment motions should be conditioned on the timely resolution of certain discovery disputes among the Columbia Basin Electric Cooperative, PacifiCorp, and the Caithness Parties.

The requested schedule would reduce litigation expenses and preserve Commission resources. Furthermore, since cross summary judgment motions would be filed on the date opening briefs are currently due, the revised schedule would not delay the resolution of this dispute.³

The Parties have also conferred with legal counsel for intervenors Umatilla Electric Cooperative and Oregon Rural Electric Cooperative Association, which have no objection to the revised procedural schedule.

Counsel for Columbia Basin Electric Cooperative and the Caithness Parties have authorized counsel for PacifiCorp to file this joint motion on their behalf.

Respectfully submitted this 11th day of June, 2014.

By:



Dustin Till
Senior Counsel
PacifiCorp d/b/a Pacific Power

³ The Parties recognize that additional testimony, cross examination, and a hearing may be necessary in the event that the Commission denies the cross summary judgment motions.