



**Portland General Electric Company**  
*Legal Department*  
121 SW Salmon Street • Portland, Oregon 97204  
503-464-7181 • Facsimile 503-464-2200

**V. Denise Saunders**  
*Associate General Counsel*

January 31, 2017

***Via Electronic Filing***

Public Utility Commission of Oregon  
Filing Center  
201 High St SE, Suite 100  
PO Box 1088  
Salem OR 97308-1088

Re: UM 1805 – Northwest and Intermountain Power Producers Coalition, Community Renewable Energy Association, and Renewable Energy Coalition, Complainants vs. Portland General Electric Company, Defendant

Attention Filing Center:

Enclosed for filing in Docket UM 1805 is Portland General Electric Company's Reply to Complainants' January 24, 2017 response to PGE's motions.

Thank you in advance for your assistance.

Sincerely,

A handwritten signature in blue ink that reads "V. Denise Saunders". The signature is written in a cursive, flowing style.

V. Denise Saunders  
Associate General Counsel

VDS:bop

Enclosure

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**UM 1805**

NORTHWEST AND INTERMOUNTAIN  
POWER PRODUCERS COALITION;  
COMMUNITY RENEWABLE ENERGY  
ASSOCIATION and RENEWABLE  
ENERGY COALITION,

Complainants,

vs.

PORTLAND GENERAL ELECTRIC  
COMPANY,

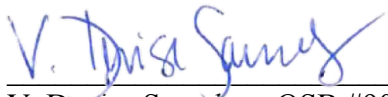
Defendant.

**PORTLAND GENERAL ELECTRIC  
COMPANY’S REPLY TO NORTHWEST  
INTERMOUNTAIN POWER  
PRODUCERS COALITION,  
COMMUNITY RENEWABLE ENERGY  
ASSOCIATION, AND RENEWABLE  
ENERGY COALITION’S RESPONSE TO  
PORTLAND GENERAL ELECTRIC  
COMPANY’S (1) MOTION TO STRIKE,  
(2) MOTION TO MAKE MORE  
DEFINITE AND CERTAIN, AND (3)  
MOTION REQUESTING MORE TIME**

Portland General Electric Company (“PGE”) respectfully submits this reply to Complainants’ January 24, 2017 response (“Response”). Without getting into a point-by-point dispute about the numerous arguments and allegations made in the Response, most of which PGE disagrees with, PGE simply reiterates its request that the Administrative Law Judge require Complainants to amend the Complaint to identify what statute, rule or Commission order they claim PGE violated and to clarify the remedy that they seek.

Dated this 31st day of January 2017.

Respectfully submitted,



V. Denise Saunders, OSB #903769  
Associate General Counsel  
Portland General Electric Company  
121 SW Salmon Street, 1WTC1301  
Portland, Oregon 97204  
(541) 752-9060 (phone)  
(503) 464-2200 (fax)  
[denise.saunders@pgn.com](mailto:denise.saunders@pgn.com)



Jeffrey S. Lovinger, OSB #960147  
Law Offices of Jeffrey S. Lovinger  
2000 NE 42<sup>nd</sup> Avenue, Suite 131  
Portland, OR 97213-1397  
(503) 230-7120 (office)  
(503) 709-9549 (cell)  
[jeff@lovingerlaw.com](mailto:jeff@lovingerlaw.com)