



ALISHA TILL
Direct (503) 290-3628
alisha@mrg-law.com

January 2, 2020

VIA ELECTRONIC FILING

Attention: Filing Center
Public Utility Commission of Oregon
201 High Street SE, Suite 100
P.O. Box 1088
Salem, Oregon 97308-1088

Re: Docket UM 1829 – In the Matter of Blue Marmots, LLC vs Portland General Electric Company

Attention Filing Center:

Attached for filing in the above-captioned docket is the Parties' Joint Issues List.

Please contact this office with any questions.

Sincerely,

Alisha Till
Paralegal

Attachment

BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON

UM 1829

Blue Marmot V LLC
Blue Marmot VI LLC
Blue Marmot VII LLC
Blue Marmot VIII LLC
Blue Marmot IX LLC,
Complainants,

v.

Portland General Electric Company,
Defendant.

JOINT ISSUES LIST

1 In response to the request of the Administrative Law Judge, dated December 30, 2019,
2 Portland General Electric Company and the above-captioned Blue Marmot LLCs (Blue Marmots)
3 submit the following issues that the parties agree should define the scope of the docket initiated to
4 litigate Blue Marmots’ requests to extend the commercial online dates of its power purchase
5 agreements, (whether as Phase II of UM 1829, or a separate docket).

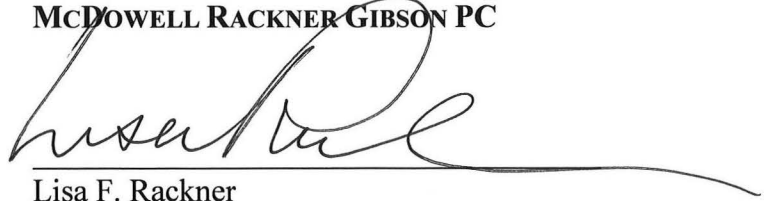
6 **I. ISSUES**

- 7 • Whether litigation caused commercially reasonable delays in the Blue Marmots’ scheduled
8 commercial operation dates listed in their partially executed PPAs?
9 • Should the Blue Marmots’ scheduled commercial operation dates be extended and if so,
10 what new dates should be included in the final executable PPAs that PGE must offer
11 consistent with the final resolution of all issues in Phase II of UM 1829 or other subsequent
12 proceedings?¹

¹ The parties note that the Blue Marmots’ Petition for Reconsideration is pending in this docket, and that the Blue Marmots have suggested that the Commission might address issues raised in that petition in a Phase II of UM 1829. The above issues list may need to be revised, depending upon how the Commission resolves the Petition for Reconsideration.

Dated January 2, 2020

MCDOWELL RACKNER GIBSON PC



Lisa F. Rackner
Jordan R. Schoonover
419 SW 11th Avenue, Suite 400
Portland, Oregon 97205
Telephone: (503) 595-3925
Facsimile: (503) 595-3928
dockets@mrg-law.com

PORTLAND GENERAL ELECTRIC COMPANY

Donald J. Light
Assistant General Counsel
121 SW Salmon Street, 1WTC1301
Portland, Oregon 97204
Telephone: (503) 464-8315
donald.light@pgn.com

Attorneys for Portland General Electric Company

SANGER LAW, PC

Irion A. Sanger
Sanger Law, PC
1041 SE 58th Place
Portland, OR 97215
Telephone: 503-756-7533
Fax: 503-334-2235
irion@sanger-law.com

Of Attorneys for Blue Marmot V, LLC, Blue Marmot VI, LLC, Blue Marmot VII, LLC, Blue Marmot VIII, LLC, and Blue Marmot IX, LLC