

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 1860 and UM 1861

RED PRAIRIE (UM 1860), VOLCANO)	
(UM 1861))	
Complainants,)	RED PRAIRIE SOLAR AND
)	VOLCANO PROPOSED DATES
v.)	
)	
PORTLAND GENERAL ELECTRIC)	
COMPANY,)	
)	
Defendant.)	
_____)	

For the reasons mentioned in the Response to Portland General Electric Company’s Motion to Suspend Due Date, Volcano Solar, LLC (“Volcano Solar”) and Red Prairie Solar, LLC (“Red Prarie Solar”) (jointly, “Complainants”) proposes that PGE’s answer to Volcano Solar’s complaint in UM 1861 be due Septemer 1, 2017. If the answer to the Volcano Solar complaint is due September 1, 2017, then the Complainants are willing to agree to total of 65 calendar days for PGE’s answer to Red Prairie Solar’s complaint in UM 1860, which would then be due October 11, 2017.

Volcano Solar has a commercial operation date of December 31, 2017, has obtained permits and interconnection agreements, and the only reason the project cannot move forward is a lack of a power purchase agreement. Volcano Solar is experiencing significant damages, which is the reason it is unwilling to more than the week extension of time PGE will have already achieved by waiting to the last minute to request

additional time. PGE appears to have opportunistically timed its request for more time so that, regardless of its reasonableness, its due date will have 27 calendar days after the complaint was filed.

Dated this 30th day of August 2017.

Respectfully submitted,



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