

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 1887

PORTLAND GENERAL ELECTRIC
COMPANY,

Complainant,

v.

COVANTA MARION, INC.

Respondent.

COVANTA MARION, INC.'S
EXPEDITED MOTION FOR
EXTENSION OF TIME TO FILE
ANSWER TO COMPLAINT AND
REQUEST FOR DISPUTE
RESOLUTION

**EXPEDITED CONSIDERATION
REQUESTED**

MOTION

Pursuant to 860-001-0420(1), Covanta Marion, Inc. (“Covanta”) respectfully requests an extension of time to answer the complaint and request for dispute resolution (“Complaint”) filed in the above-referenced docket by Portland General Electric Company (“PGE”). On August 11, 2017, PGE filed its Complaint claiming that Covanta is not entitled to a qualifying facility standard contract and instead should be required to negotiate a power purchase agreement if it desires to continue to sell its output to PGE. The undersigned counsel was just retained to defend against the Complaint, and requests a short extension of time to file its answer due to scheduling conflicts. Covanta requests an extension of time to file its answer until September 8, 2017. Pursuant to 860-001-0420(2), counsel for Covanta has conferred with counsel for PGE to seek agreement on the subject of this motion. Counsel for PGE has agreed to the requested extension. Because the answer to the Complaint is due on August 31, 2017, Covanta requests expedited consideration of this Motion.

CONCLUSION

Covanta respectfully requests the Commission issue an order granting an extension of time to answer the Complaint until September 8, 2017. The slight delay in the schedule will not unduly delay the resolution of this proceeding, and this motion is uncontested by PGE.

Dated this 25th day of August, 2017.

Respectfully submitted,

/s/ Richard Lorenz

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