

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 1931

PORTLAND GENERAL ELECTRIC COMPANY,)	
)	
Complainant,)	DEFENDANTS’ UNOPPOSED MOTION
)	FOR EXTENSION OF TIME TO REPLY
v.)	IN SUPPORT OF MOTION FOR
)	PROTECTIVE ORDER STAYING
)	DISCOVERY
ALFALFA SOLAR I LLC, et al.)	
)	<i>EXPEDITED PROCESSING REQUESTED</i>
Defendants.)	

Pursuant to OAR 860-001-0420, defendants Alfalfa Solar I LLC (“Alfalfa”), Dayton Solar I LLC (“Dayton”), Fort Rock Solar I LLC (“Fort Rock I”), Fort Rock Solar II LLC (Fort Rock II”), Fort Rock Solar IV LLC (“Fort Rock IV”), Harney Solar I LLC (“Harney”), Riley Solar I LLC (“Riley”), Starvation Solar I LLC (“Starvation”), Tygh Valley Solar I LLC (“Tygh Valley”), and Wasco Solar I LLC (“Wasco”) (collectively, the “NewSun Parties”), hereby request a one-week extension of time to file a reply in support of their Motion for Protective Order Staying Discovery, which would make the reply due July 27, 2018.

The purpose of the requested extension of time is to allow time for the NewSun Parties and Portland General Electric Company (“PGE”) to explore the possibility of resolving the outstanding discovery dispute. PGE filed its Response to the Motion for Protective Order on July 13, 2018, and therefore, without the one-week extension, the due date for a reply would be seven days later, which is today, July 20, 2018. *See* OAR 860-001-420(5). The proposed due

date for the reply under this motion would be July 27, 2018, which will allow PGE and the NewSun Parties explore resolution of the discovery dispute.

No party opposes this motion for extension of time. Counsel for PGE has stated via electronic mail that PGE does not oppose this motion for extension of time. Likewise, counsel for the Northwest and Intermountain Power Producers Coalition, the Renewable Energy Coalition, and the Community Renewable Energy Coalition stated via telephone that those intervenor parties do not object to this motion. Accordingly, the NewSun Parties respectfully request expedited ruling today without waiting for responses from those parties.

DATED this 20th day of July 2018.

By: /s/ Gregory M. Adams
Gregory M. Adams, OSB No. 101779
RICHARDSON ADAMS, PLLC
515 North 27th Street
Boise, ID 83702
Telephone: (208) 938-2236
Facsimile: (208) 939-7904
Email: greg@richardsonadams.com

-and-

Robert A. Shlachter, OSB No. 911718
Keil M. Mueller, OSB No. 085535
STOLL STOLL BERNE LOKTING &
SHLACHTER P.C.
209 SW Oak Street, Suite 500
Portland, OR 97204
Telephone: (503) 227-1600
Facsimile: (503) 227-6840
Email: rshlachter@stollberne.com
 kmueller@stollberne.com

Attorneys for Defendants