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February 16, 2024

*Via Electronic Filing*

Public Utility Commission of Oregon  
Attn: Filing Center  
201 High St. SE, Suite 100  
Salem, OR 97301  
puc.filingcenter@puc.oregon.gov

Re: Docket No. UE 428 – Samuel Drevo’s Unopposed Request for Extension of Time to File Intervenors’ and PUC Staff’s Opening Briefs

Attention Filing Center,

Please find attached for filing in the above-referenced proceeding Samuel Drevo’s Unopposed Request for Extension of Time to File Intervenors’ and PUC Staff’s Opening Briefs and all Parties’ Cross-Answering Replies.

Counsel for Mr. Drevo respectfully requests a seven-day extension of time for all Intervenors and PUC Staff to file their Opening Briefs and a seven-day extension of time for all Cross-Answering Replies in this proceeding for the reasons set forth in the filing below. Because the current deadline for Intervenors’ and PUC Staff’s brief is February 20, counsel for Mr. Drevo requests expedited resolution of this request.

Thank you for your assistance. Please do not hesitate to contact me with any questions regarding this filing. Mr. Drevo can be contacted via his attorney, listed in the petition below.

Thank you,

*/s/ Matthew J. Preusch*

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Counsel for Samuel Drevo and *James* Plaintiffs

BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON

UE 428

In the Matter of

PACIFICORP, dba PACIFIC POWER,

Advice No. 23-018 (ADV 1545),  
Modifications to Rule 4, Application for  
Electrical Service.

**INTERVENOR SAMUEL DREVO'S  
UNOPPOSED REQUEST FOR  
EXTENSION OF TIME TO FILE  
OPENING BRIEFS AND CROSS-  
ANSWERING REPLIES AND  
REQUEST FOR EXPEDITED  
CONSIDERATION**

Pursuant to ORS Chapter 182 and OAR Chapter 860, Intervenor Samuel Drevo, through the undersigned counsel, requests an extension of time of seven (7) days, until February 27, 2024, in which to file his and all other Intervenor's opening briefs and PUC Staff's opening brief, and a corresponding extension of time of seven (7) days, until March 12, 2024, for all cross-answering replies. Intervenor Drevo respectfully requests expedited consideration of this request.

In support of this request, the undersigned represents as follows:

1. Prior to filing this request, counsel for Intervenor Drevo gave notice to the other parties to this proceeding, and no parties have previously obtained written extension or extensions of these deadlines.
2. Intervenor Drevo has good cause for requesting this extension; namely, a key member of Mr. Drevo's counsel has contracted COVID, and Mr. Drevo's counsel is preparing for a trial related to this proceeding that will begin on February 26. No party objects to this request.
3. The following Intervenor's conferred and are unopposed to Mr. Drevo's request for a seven-day extension, until February 27, 2024, for opening briefs: PGE, Oregon

DREVO'S REQUEST FOR EXTENSION AND FOR EXPEDITED CONSIDERATION- 1

Consumer Justice, Sierra Club and GEI, Oregon CUB, and AWEC.<sup>1</sup> PUC Staff is also unopposed to moving its deadline for opening brief to February 27, 2024, to stay on the same schedule as all other parties.

4. As part of their stipulation to Intervenor Drevo's request, the aforementioned parties agreed to a seven-day extension of time, until March 12, 2024, to file cross-answering briefs.
5. PacifiCorp is unopposed to Intervenor Drevo's request for an extension so long as all other intervenors' deadlines for an opening brief are likewise extended to February 27, 2024 and the deadline for cross-answering replies is extended to March 12, 2024.
6. Intervenor Drevo's counsel respectfully requests that his request for an extension of time receive expedited review. In support of this request for expedited consideration, Intervenor Drevo references the approaching due date for all Intervenor's opening briefs (February 20, 2024).

RESPECTFULLY SUBMITTED this 16th day of February, 2024.

KELLER ROHRBACK L.L.P.

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<sup>1</sup> As of the time of filing, intervenor Idaho Power had not provided a response or position on Intervenor Drevo's request for an extension of time.

-AND-

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