



COLE ALBEE
Main (503) 595-3922
cole@mrg-law.com

April 18, 2024

VIA E-MAIL TO

Public Utility Commission of Oregon
Filing Center
201 High Street SE, Suite 100
Salem, Oregon 97301-3398

Re: Docket UM 2322 - In the Matter of Pilot Rock Solar 1, LLC, an Oregon limited liability company; Pilot Rock Solar 2, LLC, an Oregon limited liability company; Tutuilla Solar, LLC, an Oregon limited liability company; Buckaroo Solar 1, LLC; and Buckaroo Solar 2, LLC

Attention Filing Center:

Attached for filing in the above-referenced docket, please find PacifiCorp's Response to Complainants' Motion for Interim Relief and Preliminary Injunction.

Please contact this office with any questions.

Sincerely,

Cole Albee
Paralegal
McDowell Rackner Gibson PC

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 2322

PILOT ROCK SOLAR 1, LLC; PILOT
ROCK SOLAR 2, LLC; TUTUILLA
SOLAR, LLC; BUCKAROO SOLAR 1,
LLC; and BUCKAROO SOLAR 2, LLC,

Complainants,

v.

PACIFICORP, d/b/a PACIFIC POWER,

Defendant.

**PACIFICORP’S RESPONSE TO
COMPLAINANTS’ MOTION FOR
INTERIM RELIEF AND
PRELIMINARY INJUNCTION**

1 In accordance with OAR 860-001-0420(4), PacifiCorp, d/b/a Pacific Power,
2 submits this response to the Motion for Interim Relief and Preliminary Injunction (Motion)
3 filed on April 4, 2024, by Pilot Rock Solar 1, LLC, Pilot Rock Solar 2, LLC, Tutuilla
4 Solar, LLC, Buckaroo Solar 1, LLC, and Buckaroo Solar 2, LLC (collectively, the
5 Complainants or Sunthurst Projects). Complainants request an order from the Public
6 Utility Commission of Oregon (Commission) prohibiting PacifiCorp from terminating the
7 Sunthurst Projects’ interconnection agreements or withdrawing the Sunthurst Projects from
8 the interconnection queue for the duration of this case.¹

9 On April 5, 2024, the Commission granted interim relief “for a period of 30 days,
10 for the purpose of providing time for the Commission to receive a reply from PacifiCorp
11 and to review the motion for interim relief and preliminary injunction in full on its merits.”²

¹ Motion at 24.

² *In the Matter of Pilot Rock Solar 1, LLC; Pilot Rock Solar 2, LLC; Tutuilla Solar, LLC; Buckaroo Solar 1, LLC; and Buckaroo Solar 2, LLC vs. PacifiCorp, dba Pacific Power*, Docket No. UM 2322, Order No. 24-092 at 2 (Apr. 5, 2024).

1 The Commission ordered PacifiCorp “not to terminate the Sunthurst Projects’
2 interconnection agreements until such time as the Commission issues a ruling or order on
3 the initial motion, whichever shall occur first.”³

4 After conferring with Complainants, PacifiCorp agrees that it will not terminate the
5 interconnection agreements or withdraw Complainants from the interconnection queue
6 pending resolution of docket UM 2322.

Respectfully submitted this 18th day of April, 2024.

By: 

Adam Lowney
McDowell Rackner Gibson PC
419 SW 11th Avenue, Suite 400
Portland, OR 97212
Email: adam@mrg-law.com

Matthew Loftus
PacifiCorp
825 N.E. Multnomah, Suite 2000
Portland, OR 97232
(503) 813-5620
Email: Matthew.Loftus@PacifiCorp.com

Attorneys for PacifiCorp d/b/a Pacific Power

³ *Id.*