

SCOTT Annette

From: ARLOW Allan
Sent: Thursday, October 20, 2016 3:46 PM
To: SCOTT Annette
Subject: FW: Timeframe for PacifiCorp's Response to CREA's Motion to Compel in UM 1794

From: Apperson, Erin [<mailto:Erin.Apperson@pacificorp.com>]
Sent: Thursday, October 20, 2016 9:30 AM
To: ARLOW Allan
Cc: Oregon Dockets; dockets@renewablenw.org; Greg Adams; ANDRUS Brittany; ANDRUS Stephanie; Apperson, Erin; jeff@oseia.org; Dalley, Bryce; dina@renewablenw.org; jravenesanmarcos@yahoo.com; erica@oseia.org; irion@sanger-law.com; brian.skeahan@yahoo.com; silvia@renewablenw.org; sidney@sanger-law.com
Subject: Timeframe for PacifiCorp's Response to CREA's Motion to Compel in UM 1794

Judge Arlow,

PacifiCorp respectfully objects to CREA's request for expedited consideration to allow PacifiCorp only two days to respond to CREA's motion to compel. As PacifiCorp communicated to CREA before CREA filed its motion, a two day response time is unreasonable and would not provide PacifiCorp adequate opportunity to respond to CREA's arguments. Moreover, a two day response time not warranted because CREA's testimony is not due until November 18, 2016.

In its motion to compel, CREA states that PacifiCorp already had the opportunity to present its objections in its request for clarification or certification. CREA once again conflates the procedural rules to suit its needs and CREA should not be able to deny PacifiCorp adequate time to fully respond to CREA's motion just because PacifiCorp filed a separate motion in this proceeding. Moreover, it is premature for CREA to file its motion to compel before receiving a ruling on PacifiCorp's motion for clarification or certification.

When PacifiCorp filed its motion for clarification or certification, it had not yet filed its initial testimony. In its motion to compel, CREA cites to PacifiCorp's opening testimony and presents arguments based on that testimony. PacifiCorp should not be denied adequate time to respond to these new arguments.

Please let PacifiCorp know if it should file a formal motion objecting to CREA's request to significantly shorten the timeframe for PacifiCorp's response.

Erin Apperson
Attorney, Pacific Power
PacifiCorp
825 NE Multnomah St., Suite 1800
Portland, OR 97232
|503-813-6642 office |503-964-3542 cell
Erin.Apperson@pacificorp.com

THIS COMMUNICATION MAY CONTAIN CONFIDENTIAL INFORMATION AND MAY BE SUBJECT TO ATTORNEY-CLIENT PRIVILEGE, THE ATTORNEY WORK PRODUCT DOCTRINE, THE JOINT DEFENSE PRIVILEGE, AND/OR OTHER PRIVILEGES. If you are not the intended recipient(s), or the employee or agent responsible for delivery of this message to the intended recipient(s), you are hereby notified

that any dissemination, distribution or copying of this e-mail message is strictly prohibited. If you have received this message in error, please immediately notify the sender and delete this e-mail message from your computer.