



**Portland General Electric Company**  
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**Donald J. Light**  
*Assistant General Counsel*

April 6, 2018

***Via Electronic Filing***

Public Utility Commission of Oregon  
Filing Center  
201 High St SE, Suite 100  
P.O. Box 1088  
Salem, OR 97308-1088

Re: BOTTLENOSE SOLAR, LLC (UM 1877); VALHALLA SOLAR, LLC (UM 1878); WHIPSNAKE SOLAR, LLC (UM 1879); SKYWARD SOLAR, LLC (UM 1880); LEATHERBACK SOLAR, LLC (UM 1881); PIKA SOLAR, LLC (UM 1882); COTTONTAIL SOLAR, LLC (UM 1884); OSPREY SOLAR, LLC (UM 1885); WAPITI SOLAR, LLC (UM 1886); BIGHORN SOLAR, LLC (UM 1888); MINKE SOLAR LLC (UM 1889); and HARRIER SOLAR LLC (UM 1890) v. PORTLAND GENERAL ELECTRIC COMPANY

Attention Filing Center:

Enclosed is an Errata to Portland General Electric Company's Motion for Summary Judgment in the above-named dockets for filing.

Thank you for your assistance.

Sincerely,

A handwritten signature in blue ink that reads "Donald J. Light". The signature is written in a cursive, flowing style.

Donald J. Light  
Assistant General Counsel

DJL:hp  
Enclosure

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**UM 1877-UM 1882, UM 1884-UM 1886, UM 1888-UM 1890**

BOTTLENOSE SOLAR, LLC (UM 1877);  
VALHALLA SOLAR, LLC (UM 1878);  
WHIPSNAKE SOLAR, LLC (UM 1879);  
SKYWARD SOLAR, LLC (UM 1880);  
LEATHERBACK SOLAR, LLC (UM 1881);  
PIKA SOLAR, LLC (UM 1882);  
COTTONTAIL SOLAR, LLC (UM 1884);  
OSPREY SOLAR, LLC (UM 1885);  
WAPITI SOLAR, LLC (UM 1886);  
BIGHORN SOLAR, LLC (UM 1888);  
MINKE SOLAR, LLC (UM 1889);  
HARRIER SOLAR, LLC (UM 1890),

Complainants,

vs.

PORTLAND GENERAL ELECTRIC  
COMPANY,

Defendant.

**ERRATA TO PORTLAND  
GENERAL ELECTRIC  
COMPANY’S MOTION FOR  
SUMMARY JUDGMENT**

Portland General Electric Company (“PGE”) respectfully submits the attached Exhibit A document as an errata filing to replace the Exhibit A attached to PGE’s January 24, 2018, motion for summary judgment filed in the above-captioned proceedings (“Motion for Summary Judgment”).

PGE’s Motion for Summary Judgment included Exhibit A, which is a table intended to summarize the dates provided in the “Summary of Relevant Facts” section of the Motion for Summary Judgment.<sup>1</sup> The “Summary of Relevant Facts” includes six tables (Table A through Table F) and Exhibit A combines key dates from these six tables for ease of reference. The last

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<sup>1</sup> See, e.g., *Valhalla Solar LLC v. Portland Gen. Elec. Co.*, PGE’s Motion for Summary Judgment at 6-13 (Jan. 24, 2018).

column of Exhibit A—entitled “Assessment: Earliest Date Executable Due Based on Initial Change Request”—is intended to summarize the information contained at the top of page 13 of the Motion for Summary Judgment. Specifically, the relevant portion of page 13 states:

Assuming *arguendo* that each Complainant accepted all of the terms and conditions in the revised draft contracts provided by PGE on June 14, 2017, then the *earliest* that each Complainant would have been entitled to an executable PPA would have been 15 business days later on July 6, 2017. As a result, even if the Commission had set the effective date of the May 1 avoided cost rate update at June 28, 2017, as requested by Renewable Energy Coalition and other QF representatives and stakeholders, it would not have made any substantive difference. Having requested changes to their draft PPAs on May 23, 2017, none of the Complainants had a right to an executable PPA before July 6, 2017, at the earliest.<sup>2</sup>

Consistent with this analysis from the body of the Motion for Summary Judgment, the last column of the table enclosed as Exhibit A should have stated that the earliest date an executable contract could be due based on the date of Complainants’ initial requests for changes to their draft PPAs was **July 6, 2017**; but instead the last column of the table erroneously summarized the date as June 14, 2017. PGE has enclosed with this filing a corrected version of the table provided as Exhibit A to the Motion for Summary Judgment. The only change to Exhibit A is to correct the date in the last column from the erroneous June 14, 2017 date to the correct July 6, 2017 date.

PGE respectfully requests that the Commission replace the version of Exhibit A submitted with the January 24, 2018 Motion for Summary Judgment with the corrected version

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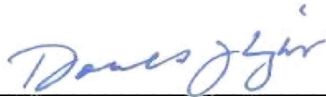
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<sup>2</sup> PGE’s Motion for Summary Judgment at 13.

of Exhibit A attached hereto. PGE apologizes for any confusion created by the erroneous date contained in the last column of the original version of Exhibit A filed January 24, 2018.

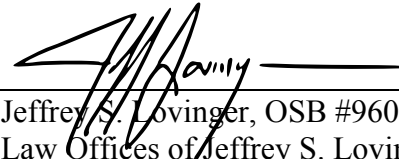
DATED this 6th day of April, 2018.

Respectfully submitted,



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**UM 1877-UM 1882, UM 1884-UM 1886, UM 1888-UM 1890**

Bottlenose Solar, LLC, et al

vs.

Portland General Electric Company

**EXHIBIT A**

**(Corrected version of Exhibit A to PGE's Motion for Summary  
Judgment filed on 01/24/18)**

(The information contained in Tables A through F of the Errata to Portland General Electric Company's  
Motion for Summary Judgment have been combined into one table as Exhibit A)

<b>Milestone: PGE Requested Additional Information Regarding Project Submission</b>				<b>Milestone: PGE Issued Draft PPA</b>			<b>Assessment: Earliest Date Executable Due If No Change Requested to Draft PPA</b>		<b>Assessment: Earliest Date Executable Due Based On Initial Change Request</b>	
<b>Project</b>	<b>QF's Initial Submission of Project Information</b>	<b>PGE Requests Additional Information</b>	<b>Business Days Elapsed</b>	<b>Complainant Provided Additional Info.</b>	<b>PGE Provided Draft PPA</b>	<b>Elapsed Business Days</b>	<b>PGE Provided Draft PPA</b>	<b>Earliest Date Executable PPA Due</b>	<b>Changes Requested by Complainant</b>	<b>Earliest Date Executable PPA Due</b>
Valhalla	April 26, 2017	n/a	n/a	n/a	May 15, 2017 (after 5:00 PM)	14	May 15, 2017 (after 5:00 PM)	June 7, 2017	May 23 & 26, 2017	July 6, 2017
Skyward	April 26, 2017	n/a	n/a	n/a	May 15, 2017 (after 5:00 PM)	14	May 15, 2017 (after 5:00 PM)	June 7, 2017	May 23 & 26, 2017	July 6, 2017
Cottontail	March 22, 2017 (After 5:00 PM)	April 13, 2017	15	April 26, 2017	May 16, 2017	14	May 16, 2017	June 7, 2017	May 23, 2017	July 6, 2017
Osprey	March 22, 2017 (After 5:00 PM)	April 13, 2017	15	April 26, 2017	May 15, 2017 (after 5:00 PM)	14	May 15, 2017 (after 5:00 PM)	June 7, 2017	May 23, 2017	July 6, 2017
Wapiti	March 22, 2017 (After 5:00 PM)	April 13, 2017	15	April 26, 2017	May 15, 2017 (after 5:00 PM)	14	May 15, 2017 (after 5:00 PM)	June 7, 2017	May 23, 2017	July 6, 2017
Bighorn	April 4, 2017	April 25, 2017	15	May 1, 2017	May 18, 2017	13	May 18, 2017	June 9, 2017	May 23 & 26, 2017	July 6, 2017
Minke	April 4, 2017	April 25, 2017	15	May 1, 2017	May 18, 2017	13	May 18, 2017	June 9, 2017	May 23 & 26, 2017	July 6, 2017
Harrier	April 4, 2017	April 25, 2017	15	May 1, 2017	May 18, 2017	13	May 18, 2017	June 9, 2017	May 23 & 26, 2017	July 6, 2017
Bottlenose	March 22, 2017	April 13, 2017	16	April 27, 2017	May 23, 2017	18	May 23, 2017	June 14, 2017	May 23 & 24, 2017	July 6, 2017
Whipsnake	March 22, 2017	April 13, 2017	16	April 27, 2017	May 23, 2017	18	May 23, 2017	June 14, 2017	May 23 & 24, 2017	July 6, 2017
Leatherback	March 22, 2017	April 13, 2017	16	April 27, 2017	May 23, 2017	18	May 23, 2017	June 14, 2017	May 23 & 24, 2017	July 6, 2017
Pika	March 22, 2017	April 13, 2017	16	April 27, 2017	May 23, 2017	18	May 23, 2017	June 14, 2017	May 23 & 24, 2017	July 6, 2017