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March 14, 2014

Via E-Mail and Federal Express

Public Utility Commission of Oregon
Attn: Filing Center
3930 Fairview Industrial Drive SE
Salem OR 97302

Re: Renewable Energy Coalition
Petition for Declaratory Ruling
Docket No. DR 48

Dear Filing Center:

Enclosed for filing in the above-referenced matter, please find the original and one (1) copy of the Motion of Renewable Energy Coalition to File Reply to PacifiCorp's Response.

Thank you for your assistance with this matter, and please do not hesitate to contact our office with any questions.

Sincerely,



Jesse O. Gorsuch

Enclosures

cc: Service List

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have this day served the attached **Motion of Renewable Energy Coalition to File Reply to PacifiCorp's Response** upon all parties in this proceeding by sending a copy via electronic mail to the following parties at the following addresses.

Dated at Portland, Oregon, this 14th day of March, 2014.

Sincerely,



Jesse Gorsuch

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PROJECT**

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**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

DR 48

In the Matter of)	
)	
THE RENEWABLE ENERGY)	MOTION OF RENEWABLE ENERGY
COALITION Petition For)	COALITION TO FILE REPLY TO
Declaratory Ruling,)	PACIFICORP’S RESPONSE
)	
Petitioner.)	
_____)	

Pursuant to OAR §§ 860-001-0000(2) and 860-001-0400(5), the Renewable Energy Coalition (the “Coalition”) moves for leave to file a reply to PacifiCorp’s Response to the Coalition’s Petition for Declaratory Ruling. Replies have been filed in previous declaratory ruling dockets, including DR 46 (Response of Troutdale Energy Center, LLC) and DR 43 (Reply of NW Natural Gas Co.). Moreover, good cause exists to allow the Coalition to file a reply. As more thoroughly discussed in its Reply, which is attached to this Motion, PacifiCorp’s response may create the impression that only one qualifying facility (“QF”) would be impacted by the Coalition’s Petition; however, this Petition will in fact have much broader potential impact. Additionally, PacifiCorp’s argument that the Commission can address the issue raised by the Coalition in its UM 1610 investigation is incorrect, as is the Company’s assertion that a ruling on the Petition will be ineffective to bind QFs and the Company. For these reasons, and as discussed more thoroughly in its Reply, the Coalition respectfully requests that the Commission grant leave to file the attached Reply to PacifiCorp’s Response.

Dated this 14th day of March, 2014.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.



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