

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON
UM 1670**

In the Matter of

COLUMBIA BASIN ELECTRIC
COOPERATIVE, INC.,

Complainant,

v.

PACIFICORP dba PACIFIC POWER,
NORTH HURLBURT WIND, LLC, SOUTH
HURLBURT WIND, LLC, HORSESHOE
BEND WIND, LLC and CAITHNESS
SHEPHERDS FLAT, LLC,

Defendants.

**CAITHNESS SHEPHERDS FLAT,
LLC'S MOTION FOR EXTENSION OF
TIME TO FILE RESPONSE TO DATA
REQUESTS**

MOTION

Caithness Shepherds Flat, LLC ("CSF") hereby moves for an extension of time to file its response to Columbia Basin Electric Cooperative's ("CBEC's") First Set of Data Requests. CSF requests that its deadline to respond to the data requests be reset for 7 business days from the ALJ's disposition of the prehearing conference on discovery scheduled for July 21, 2014.¹

¹ By email on the morning of July 15, 2014, counsel for CSF requested the above-referenced extension of time from CBEC's counsel. CSF had not received a response as of the time of filing this motion.

DISCUSSION

CSF requests the extension of time to respond to CBEC's first set of data requests for two reasons.

First, CSF requires additional time to process the requests due to previously scheduled unavailability of CSF's counsel and primary contact. CBEC served its first set of data requests (25 in total) on CSF on July 1, 2014. As previously discussed with the parties, the undersigned was scheduled to be out of the office for the first two weeks of July. CSF's primary client contact was out of the country for the vast majority of that time as well. Counsel was not able to discuss the specifics of these data requests until earlier today, July 15, with the client representative.

Second, CSF's preliminary review of the data requests suggests that many of the objections that North Hurlburt has previously raised to CBEC counsel regarding the broad scope of the requested discovery apply to many of the data requests now made to CSF. These requests, which span such varying topics as employee information for various defendants, sensitive business contracts with third parties and budgeting information, seek information that is commercially sensitive, confidential, potentially burdensome, and appear to have limited relevance to the primary legal issues in this matter.

CSF expects that the reasonable scope of discovery will be a significant issue to be addressed in the prehearing conference scheduled for July 21. CSF anticipates that the Commission's guidance from that hearing will assist the parties in resolving further discovery matters and provide CSF guidance in responding to the new requests.

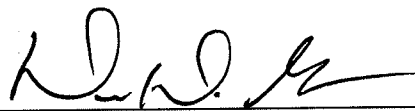
CONCLUSION

For the above reasons, CSF requests the Commission order CSF's responses to CBEC's first set of data requests to be due 7 business days after the Commission's disposition of the July 21, 2014 Prehearing Conference.

DATED this 15th day of July, 2014.

DAVIS WRIGHT TREMAINE LLP

By



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Of Attorneys for Defendants North Hurlburt Wind, LLC, South Hurlburt Wind, LLC, Horseshoe Bend Wind, LLC and Caithness Shepherds Flat, LLC

CERTIFICATE OF FILING AND SERVICE
Docket No. UM 1670


I hereby certify that on the date given below the original and one true and correct copy of the foregoing **DEFENDANT CAITHNESS SHEPHERDS FLAT, LLC'S MOTION FOR EXTENSION OF TIME TO FILE RESPONSE TO DATA REQUESTS** were sent by email and first-class mail to:

Public Utility Commission of Oregon
3930 Fairview Industrial Drive SE
PO Box 1088
Salem, OR 97308-1088
E-mail: puc.filingcenter@state.or.us

On the same date, a true and correct copy of the foregoing document was sent to the following parties by electronic mail: fade@bendbroadband.com; tgrim@cablehouston.com; tbrooks@cablehouston.com; jerryh@columbiabasin.cc; kindleylaw@comcast.net; tcase@oreca.org; dustin.till@pacificorp.com; oregondockets@pacificorp.com; and steve.eldrige@umatillaelectric.com.

DATED this 15th day of July, 2014.

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