

# KINDLEY LAW PC

RAYMOND S. KINDLEY

ADMITTED IN OREGON AND WASHINGTON

December 5, 2013

## VIA ELECTRONIC AND U.S. MAIL

PUC Filing Center  
Public Utility Commission of Oregon  
P.O. Box 2148  
Salem, OR 97308-2148

**Re: UM1670 – Columbia Basin Electric Cooperative vs Pacific Power &  
North Hurlburt Wind LLC**

Attention Filing Center:

Enclosed for filing in docket UM-1670, are an original and two copies of Columbia Basin Electric Cooperative's Motion to Temporarily Suspend Procedural Schedule.

A copy of this filing has been served on all parties to this proceeding as indicated on the attached certificate of service.

Please contact this office with any questions.

Sincerely,

/s/ Raymond S. Kindley

Raymond S. Kindley  
Attorney for Columbia Basin Electric Cooperative, Inc.

cc: UM 1670 Service List

## CERTIFICATE OF SERVICE

I hereby certify that on the 5<sup>th</sup> day of December, 2013, I served the foregoing document upon the persons named on the service list by electronic mail only as all parties have waived paper service.

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DATED: December 5, 2013

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5  
6 **BEFORE THE**  
7 **PUBLIC UTILITY COMMISSION OF OREGON**

8 COLUMBIA BASIN ELECTRIC ) Docket No. UM 1670  
COOPERATIVE, INC. an Oregon )  
9 cooperative corporation ) COLUMBIA BASIN ELECTRIC  
Complainant, ) COOPERATIVE, INC'S MOTION  
10 vs. ) TO TEMPORARILY SUSPEND  
PACIFICORP, dba Pacific Power, an ) PROCEDURAL SCHEDULE  
11 Oregon business corporation, )  
12 Defendant )  
and )  
13 NORTH HURLBURT WIND, LLC, a )  
foreign limited liability company, )  
14 Defendant )

15  
16 The Complainant Columbia Basin Electric Cooperative (the "Cooperative") requests a temporary  
17 suspension of the procedural schedule to allow the parties additional time to negotiate a resolution to this docket.  
18 Defendants Pacific Power and North Hurlburt Wind, LLC met with the Cooperative at a settlement meeting on  
19 Tuesday, December 3, 2013. Suspension of the schedule was discussed at that meeting and subsequently after the  
20 meeting. Pacific Power and North Hurlburt Wind, LLC do not object to the filing of this motion.

21 **BASIS FOR MOTION**

22 At the settlement conference on December 3, 2013, Pacific Power, North Hurlburt Wind, LLC and the  
23 Cooperative discussed general terms for settlement of all issues in this docket. Those parties tentatively agreed on a  
24 framework for settlement. One key feature of any proposed settlement among these parties, however, depends upon  
25 the Cooperative reaching a separate agreement with its power supplier, the Bonneville Power Administration. The  
26 Cooperative believes it will reach an agreement with the Bonneville Power Administration, but achieving that

1 agreement may take an indefinite amount of time given the Bonneville Power Administration's internal approval  
2 process.

3 In light of the ongoing negotiations in this docket, the Cooperative asks the Administrative Law Judge to  
4 suspend the current procedural schedule to allow the parties to further negotiate the terms of a final settlement and to  
5 allow the Cooperative time to reach a separate agreement with the Bonneville Power Administration. If the  
6 Cooperative, Pacific Power and North Hurlburt Wind, LLC do not reach agreement, they will ask that a new  
7 procedural schedule be implemented.

8  
9 DATED this 5th day of December 2013.

10 **KINDLEY LAW PC**

11 By /s/ Raymond S. Kindley  
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