

KINDLEY LAW PC

RAYMOND S. KINDLEY

ADMITTED IN OREGON AND WASHINGTON

August 15, 2014

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 Amend 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 15th day of August 2014, 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: August 15, 2014

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1 **BEFORE THE**

2 **PUBLIC UTILITY COMMISSION OF OREGON**

3	COLUMBIA BASIN ELECTRIC)	Docket No. UM 1670
4	COOPERATIVE, INC. an Oregon)	
	cooperative corporation)	COLUMBIA BASIN ELECTRIC
5	Complainant,)	COOPERATIVE, INC'S MOTION
	vs.)	TO AMEND PROCEDURAL SCHEDULE
6	PACIFICORP, dba Pacific Power, an)	
	Oregon business corporation,)	
7	Defendant,)	
)	
8	NORTH HURLBURT WIND, LLC, a)	
	foreign limited liability company,)	
9	Defendant,)	
)	
10	SOUTH HURLBURT WIND, LLC, a)	
	foreign limited liability company,)	
11	Defendant,)	
)	
12)	
)	
13	HORSESHOE BEND WIND, LLC, a)	
	foreign limited liability company,)	
14	Defendant,)	
	and)	
15	CAITHNESS SHEPHERDS FLAT, LLC, a)	
	foreign limited liability company,)	
16	Defendant)	
)	

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18 The Complainant Columbia Basin Electric Cooperative, Inc. (the "Cooperative") in this

19 matter respectfully requests the Oregon Public Utilities Commission (the "Commission") to

20 amend the procedural schedule. Under the current schedule, the parties' cross motions for

21 summary judgment are due August 22, 2014. The Cooperative requests the Commission to

22 strike the current deadline and reschedule the date for filing the cross motions for summary

23 judgment to October 6, 2014.

24 The parties have conferred in part. Defendant Pacific Power represented that it would not

25 object to the new date for filing the cross motions for summary judgment. Defendants North

26 Hurlburt Wind, LLC, South Hurlburt Wind, LLC, Horseshoe Bend Wind, LLC and Caithness

1 Shepherds Flat, LLC (“Caithness Parties”) represented they would not object, but did not want
2 any further amendments to the procedural schedule. Intervenors Umatilla Electric Cooperative
3 and Oregon Rural Electric Cooperative Association stated they would object to the proposed
4 revised procedural schedule.

5 The Cooperative requests this new schedule due to the Caithness Party’s challenge to the
6 Cooperative’s past data requests and the Cooperative’s receipt of approximately 5,000 pages of
7 data response documents from the Caithness Parties during the past week. The Cooperative will
8 need additional time to review those documents and possibly to make additional data request of
9 the Caithness Parties. The Cooperative has also prepared additional data requests to Pacific
10 Power.

11
12 DATED this 15th day of August 2014.

13 **KINDLEY LAW PC**

14 By /s/ Raymond S. Kindley
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