

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**UM 1794**

In the Matter of	)	
	)	
PUBLIC UTILITY COMMISSION OF	)	RENEWABLE ENERGY COALITION
OREGON	)	AND COMMUNITY RENEWABLE
	)	ENERGY ASSOCIATION MOTION
Investigation Into Schedule 37- Avoided	)	FOR EXTENSION OF TIME
Cost Purchases from Qualifying Facilities	)	
of 10,000 kw or Less.	)	EXPEDITED CONSIDERATION
_____	)	REQUESTED
	)	

Pursuant to OAR §§ 860-001-0390(2)(b) and 860-001-0420(1), the Renewable Energy Coalition (“Coalition”) and Community Renewable Energy Association (“CREA”) (jointly, “Joint QF Parties”) move that Administrative Law Judge (“ALJ”) Allan Arlow grant a three-week extension of time to file responsive testimony in the above captioned proceeding. Joint QF Parties request this extension of time to resolve ongoing discovery disputes with PacifiCorp, and the press of business. As testimony is current due tomorrow, the Joint QF Parties request expedited consideration of this motion.

Both the Coalition and CREA have had and currently have ongoing discovery disputes with PacifiCorp, which have not and will not be resolved by November 18, 2016, when their testimony is due. Joint QF Parties intend to request certification of ALJ Arlow’s November 2, 2016 ruling denying in part CREA’s motion to compel today. This schedule below may permit Joint QF Parties additional time to resolve its discovery disputes and prepare testimony while maintaining an April target order date well in advance of the May 1, 2017 annual update deadline for filing avoided cost rates.

Joint QF Parties request that responsive testimony be due on December 9, 2016 (instead of November 18, 2016), reply testimony be due on January 11, 2017 (instead of December 19, 2016), prehearing briefs be due on February 6, 2017 (instead of January 23, 2017), hearing tentatively and subject to Commission and ALJ availability be on February 21, or 22, 2016 (instead of February 13, 2017), post-hearing briefs due March 14, 2017 (instead of March 3, 2017), and target order date be on April 19, 2017 (instead of April 14, 2017).

Joint QF Parties asked for the position of the active parties in this proceeding regarding an extension of time. The Commission Staff, Oregon Solar Energy Industries Association, Renewable Northwest, and PacifiCorp either support or do not oppose an extension of time.

Separately, Joint QF Parties are filing an expedited request for certification filed today, and have conferred with PacifiCorp accordingly. PacifiCorp is willing to expedite its response to December 1, 2016 and Joint QF Parties is willing to expedite its reply to December 5, 2016. These dates allow a target date of December 12, 2016 for a Commission resolution. If the Commission grants the Joint QF Parties request by the target date, and PacifiCorp is required to provide responsive information, then the Joint QF Parties and PacifiCorp have agreed that the Joint QF Parties can file limited supplemental testimony regarding the new information on December 19, 2016.

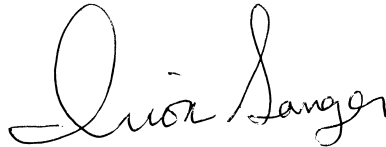
The complete proposed new schedule is:

Response Testimony	December 9
Supplemental Testimony (if necessary)	December 19
Reply Testimony	January 11
Prehearing Briefs	February 6
Hearing	February 21 or 22
Post-hearing Briefs	March 14
Target Order	April 19

Joint QF Parties request expedited consideration of this motion given that responsive testimony is currently due on November 18, 2016.

Dated this 17th day of November 2016.

Respectfully submitted,



Irion Sanger  
Sidney Villanueva  
Sanger Law, PC  
1117 SE 53rd Avenue  
Portland, OR 97215  
Telephone: 503-756-7533  
Fax: 503-334-2235  
irion@sanger-law.com

Of Attorneys for the Renewable Energy Coalition

RICHARDSON ADAMS, PLLC

*/s/ Gregory M. Adams*

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Gregory M. Adams (OSB No. 101779)  
Of Attorneys for the Community Renewable  
Energy Association