



Portland General Electric Company
Legal Department
121 SW Salmon Street • Portland, Oregon 97204
503-464-7181 • Facsimile 503-464-2200

V. Denise Saunders
Associate General Counsel

December 22, 2017

Via Electronic Filing

Public Utility Commission of Oregon
Filing Center
201 High St SE, Suite 100
PO Box 1088
Salem OR 97308-1088

Re: **UM 1877-UM 1882, UM 1884-UM 1886, UM 1888-UM 1890, Bottlenose Solar, LLC,
et al., Complainants, vs. Portland General Electric Company, Defendant**

Attention Filing Center:

Enclosed for filing in the above-captioned dockets is Portland General Electric Company's Motion for Extension of Time to file Response to Complainants' Motion to Compel with expedited consideration requested.

Thank you for your assistance.

Sincerely,

A handwritten signature in blue ink that reads "V. Denise Saunders". The signature is written in a cursive style with a large, stylized "V" and "S".

V. Denise Saunders
Associate General Counsel

VDS:bop

Enclosure

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 1877-UM 1882, UM 1884-UM 1886, UM 1888-UM 1890

BOTTLENOSE SOLAR, LLC; VALHALLA SOLAR, LLC; WHIPSNAKE SOLAR, LLC; SKYWARD SOLAR, LLC; LEATHERBACK SOLAR, LLC; PIKA SOLAR, LLC; COTTONTAIL SOLAR, LLC; OSPREY SOLAR, LLC; WAPITI SOLAR, LLC; BIGHORN SOLAR, LLC; MINKE SOLAR LLC; HARRIER SOLAR, LLC,

Complainants,

vs.

PORTLAND GENERAL ELECTRIC COMPANY,

Defendant.

PORTLAND GENERAL ELECTRIC COMPANY'S MOTION FOR EXTENTION OF TIME TO FILE RESPONSE TO COMPLAINANTS' MOTION TO COMPEL

EXPEDITED CONSIDERATION REQUESTED

Portland General Electric Company ("PGE") hereby requests an extension of time until January 11, 2018 to file its response in opposition to Complainants' motion to compel discovery filed on December 21, 2017, in the above-captioned cases.

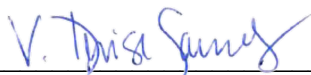
Under the Commission's rules, PGE has two weeks to respond to Complainants' motion. *See* OAR 860-001-0420(4). However, the time for responding coincides with the week spanning the Christmas and New Year holidays. PGE's attorneys and some of the staff who are needed to develop PGE's response will be on vacation during this time period.

Before Complainants filed their motion to compel, counsel for PGE asked counsel for Complainants to agree to a one-week extension of time to respond to the motion, in light of the holidays and the unavailability of PGE staff. However, Complainants have refused the requested extension of time.

Therefore, PGE respectfully requests an extension of its deadline to respond to the motion to compel from the current deadline of January 4, 2018, to a new deadline of January 11, 2018. Such an extension will accommodate preexisting vacation schedules and provide PGE with the typical two-week working period to develop its response in opposition to Complainants' motion to compel.

Dated this 22nd day of December 2017.

Respectfully submitted,



V. Denise Saunders, OSB #903769
Associate General Counsel
Portland General Electric Company
121 SW Salmon Street, 1WTC1301
Portland, Oregon 97204
(541) 752-9060 (phone)
(503) 464-2200 (fax)
denise.saunders@pgn.com



Jeffrey S. Lovinger, OSB #960147
Law Offices of Jeffrey S. Lovinger
2000 NE 42nd Avenue, Suite 131
Portland, OR 97213-1397
(503) 230-7120 (office)
(503) 709-9549 (cell)
jeff@lovingerlaw.com