

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

UM 1916

In the Matter of  
PORTLAND GENERAL ELECTRIC  
COMPANY,  
2018 Revised Renewable Portfolio  
Implementation Plan.

STAFF'S UNOPPOSED REQUEST FOR  
WAIVER OF OAR 860-083-0400(8)(a) AND  
STIPULATED MOTION TO ADOPT A  
PROCEDURAL SCHEDULE

***Expedited Consideration Requested***

Pursuant to OAR 860-001-0420(2) and OAR 860-083-0005(2), Staff of the Public Utility Commission of Oregon (Staff) moves the Administrative Law Judge (ALJ) for an order granting Staff's request to waive the time set by OAR 860-038-0400(8)(a) for filing comments in this docket. Staff further respectfully requests that the ALJ adopt the procedural schedule agreed to by the parties in this proceeding.

OAR 860-038-0400(8)(a) provides that Staff and other interested persons may file written comments on a renewable portfolio implementation plan (RPIP) within 45 calendar days of its filing, and that the electric company then has 30 days to file a written response to any comments filed. Additionally, Staff "should present its recommendation at a Commission public meeting within 120 days of the implementation plan filing date." *Id.*

OAR 860-083-0005(2) provides that the Commission may waive any of the Division 083 rules upon request or its own motion for good cause shown. Given the importance of Portland General Electric Company's (PGE) filing in light of the recently enacted SB 1547, Staff believes there is good cause in this case to waive the provisions in OAR 860-038-0400(8)(a) in order to allow for additional time for discovery and analysis prior to comments filed by Staff and intervenors. Staff's proposed schedule, shown below, allows for a final Commission action on PGE's RPIP no later than six months after PGE filed its RPIP with the Commission on December 29, 2017, as required by ORS 469A.075(3) and OAR 860-083-0400(8)(c).

1 Because February 12, 2018 marks 45 days since PGE's RPIP was filed, Staff respectfully  
2 requests expedited treatment of its motion. Staff has conferred with PGE, the Industrial  
3 Customers of Northwest Utilities, and Oregon Citizens' Utility Board. No party objects to  
4 Staff's request for waiver of OAR 860-083-0400(8)(a), which results in the following schedule:

Event	Date
Staff and Intervenor Opening Comments	March 5, 2018
PGE Response Comments	April 5, 2018
Staff Public Meeting Memo Posted on PUC website	May 3, 2018
Commission Public Meeting	May 22, 2018

5  
6  
7  
8  
9  
10  
11 Staff respectfully requests that the Commission grants its unopposed request for waiver of OAR  
12 860-083-0400(8), and that the ALJ adopt the above-proposed procedural schedule for this  
13 proceeding.

14  
15 DATED this 6<sup>th</sup> day of February, 2018

16 Respectfully submitted,

17 ELLEN F. ROSENBLUM  
18 Attorney General

19 

20 Sommer Moser, OSB # 105260  
21 Assistant Attorney General  
22 Of Attorneys for Staff of the Public Utility  
23 Commission of Oregon