



**Portland General Electric Company**  
*Legal Department*  
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**Donald J. Light**  
*Assistant General Counsel*

April 23, 2018

***Via Electronic Filing***

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

Re: BOTTLENOSE SOLAR, LLC (UM 1877); VALHALLA SOLAR, LLC (UM 1878); WHIPSNAKE SOLAR, LLC (UM 1879); SKYWARD SOLAR, LLC (UM 1880); LEATHERBACK SOLAR, LLC (UM 1881); PIKA SOLAR, LLC (UM 1882); COTTONTAIL SOLAR, LLC (UM 1884); OSPREY SOLAR, LLC (UM 1885); WAPITI SOLAR, LLC (UM 1886); BIGHORN SOLAR, LLC (UM 1888); MINKE SOLAR LLC (UM 1889); and HARRIER SOLAR LLC (UM 1890) v. PORTLAND GENERAL ELECTRIC COMPANY

Attention Filing Center:

Enclosed is Portland General Electric Company's Notice of Objection to Amendment of Complaints in the above-named dockets for filing.

Thank you for your assistance.

Sincerely,

A handwritten signature in blue ink that reads "Donald J. Light". The signature is written in a cursive, flowing style.

Donald J. Light  
Assistant General Counsel

DJL:bp

Enclosure

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

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

BOTTLENOSE SOLAR, LLC (UM 1877);  
VALHALLA SOLAR, LLC (UM 1878);  
WHIPSNAKE SOLAR, LLC (UM 1879);  
SKYWARD SOLAR, LLC (UM 1880);  
LEATHERBACK SOLAR, LLC (UM 1881);  
PIKA SOLAR, LLC (UM 1882);  
COTTONTAIL SOLAR, LLC (UM 1884);  
OSPREY SOLAR, LLC (UM 1885);  
WAPITI SOLAR, LLC (UM 1886);  
BIGHORN SOLAR, LLC (UM 1888);  
MINKE SOLAR, LLC (UM 1889);  
HARRIER SOLAR, LLC (UM 1890),

Complainants,

vs.

PORTLAND GENERAL ELECTRIC  
COMPANY,

Defendant.

**PORTLAND GENERAL  
ELECTRIC COMPANY'S  
NOTICE OF OBJECTION TO  
AMENDMENT OF  
COMPLAINTS**

On April 20, 2018, each Complainant in the above-captioned matters filed a motion for leave to amend its complaint. Complainants indicate they were unable to determine whether Portland General Electric Company (“PGE”) objects to the filing of amended complaints.<sup>1</sup> The purpose of this filing is to clarify that PGE objects.

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<sup>1</sup> Counsel for Complainants emailed counsel for PGE on the morning of April 20, 2018, to inquire whether PGE would object to Complainants seeking leave to amend their complaints. Counsel for PGE responded that PGE could not take a final position until PGE reviewed the motion for leave to amend but that PGE would likely object. Counsel for Complainants emailed a copy of the motion for leave to amend and the proposed amended complaints to counsel for PGE at 3:10 pm on April 20, 2018, and Complainants filed their motions an hour-and-a-half later at 4:40 pm. PGE and its counsel did not have an opportunity to review the draft motion or proposed amended complaints and respond to counsel for Complainants before Complainants filed their motions.

PGE does not intend for this notice to serve as its response in opposition to the motions for leave to amend. PGE reserves its right to file a substantive response in opposition by May 7, 2017, as allowed by OAR 860-001-0420(4).

DATED this 23rd day of April, 2018.

Respectfully submitted,



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/s/ Jeffrey S. Lovinger

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