

**Cleantech Law Partners, PC**  
548 Market Street, Suite 59966  
San Francisco, CA 94104  
[www.cleantechlawpartners.com](http://www.cleantechlawpartners.com)  
866.233.8064

February 22, 2016

***Via Electronic Filing***

Public Utilities Commission of Oregon  
Filing Center  
POB 2148  
Salem, OR 97308  
[puc.filingcenter@state.or.us](mailto:puc.filingcenter@state.or.us)

Re: PACIFICORP, dba PACIFIC POWER  
2017-2021 Renewable Portfolio Standard Implementation Plan  
Docket No. UM 1754

Dear Filing Center:

Enclosed for filing in the above-referenced docket please find the Petition of Small Business Utility Advocates ("SBUA") to File Comments Out of Time.

Please contact me at [dhenkels@cleantechlaw.com](mailto:dhenkels@cleantechlaw.com) or 541-270-6001 if you have any questions. Thank you for your assistance in this matter.

Sincerely,

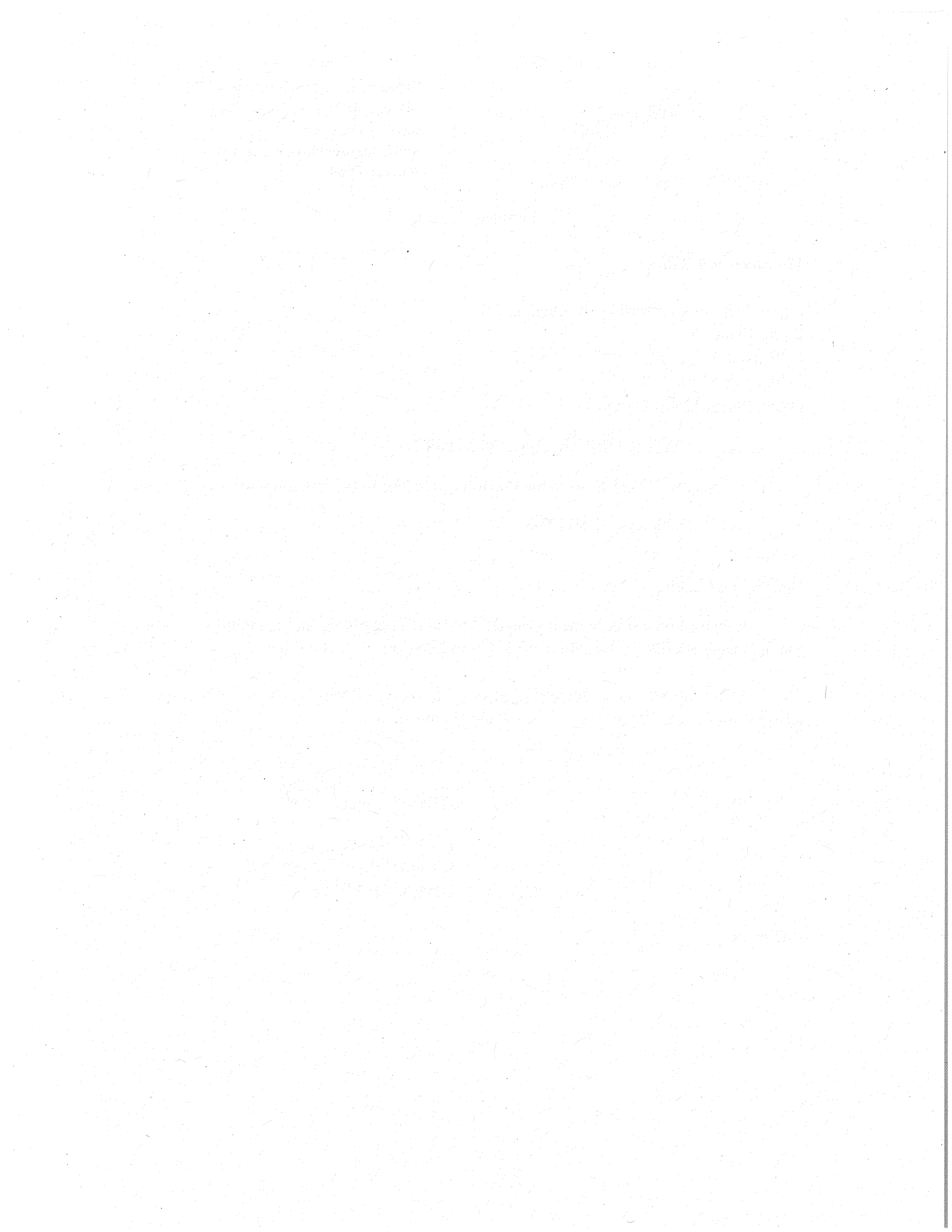
/s/ Diane Henkels 

Diane Henkels,  
Cleantech Law Partners, PC  
Counsel for SBUA

Enclosure

[www.CleantechLaw.com](http://www.CleantechLaw.com)

SAN FRANCISCO | TEL AVIV | TORONTO | PORTLAND | NEW YORK | BOSTON



**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**UM 1754**

In the Matter of	)	
	)	
PACIFICORP, dba PACIFIC POWER	)	PETITION OF SMALL BUSINESS
	)	UTILITY ADVOCATES TO FILE
2017-2021 Renewable Portfolio Standard	)	COMMENTS OUT OF TIME
Implementation Plan	)	
	)	
	)	

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Small Business Utility Advocates ("SBUA") requests permission to file comments out of time in response to PacifiCorp's Renewable Portfolio Standard Implementation Plan 2017-2021 OAR 860-083-0400 Compliance Filing (the "Implementation Plan") in this matter. SBUA would provide such comments no later than February 23, 2016.

The Commission may accept as conditionally received to meet the filing deadline documents required to be filed within a specified time but that fail to substantially comply with these rules. OAR 860-001-0150(4). SBUA acknowledges that it is requesting it be permitted to file comments even though the deadline established by the rules, OAR 860-083-0400(8)(a) is passed. SBUA submits this petition due to time constraints, and finding that these proceedings are important service to its members in light of recent and related energy regulatory events. SBUA does not believe allowing its comments out of time will delay proceedings because such comments would be brief and focused, the utility's time response deadline is postponed, and public meeting is not yet scheduled. SBUA sincerely hopes the Commission will accept and consider its comments.

Respectfully submitted February 22, 2019,



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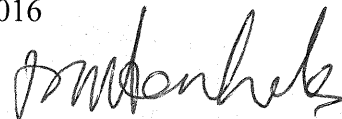
Diane Henkels  
Cleantech Law Partners PC  
Counsel for Small Business Utility Advocates

CERTIFICATE OF FILING SERVICE

I hereby certify that on February 22, 2016, I served on the following a copy of PETITION OF SMALL BUSINESS UTILITY ADVOCATES TO FILE COMMENTS OUT OF TIME in UM 1754 PacifiCorp's 2017-2021 Renewable Portfolio Standard Implementation Plan.

CITIZENS' UTILITY BOARD OF OREGON	610 SW BROADWAY, STE 400 PORTLAND OR 97205 <a href="mailto:dockets@oregoncub.org">dockets@oregoncub.org</a>
PACIFICORP, DBA PACIFIC POWER	825 NE MULTNOMAH ST, STE 2000 PORTLAND OR 97232 <a href="mailto:oregondockets@pacificorp.com">oregondockets@pacificorp.com</a>
MICHAEL BREISH (C) PUBLIC UTILITY COMMISSION OF OREGON	PO BOX 1088 SALEM OR 97308-1088 <a href="mailto:michael.breish@state.or.us">michael.breish@state.or.us</a>
JESSE E COWELL (C) DAVISON VAN CLEVE	333 SW TAYLOR ST., SUITE 400 PORTLAND OR 97204 <a href="mailto:jec@dvclaw.com">jec@dvclaw.com</a>
R. BRYCE DALLEY PACIFIC POWER	825 NE MULTNOMAH ST., STE 2000 PORTLAND OR 97232 <a href="mailto:bryce.dalley@pacificorp.com">bryce.dalley@pacificorp.com</a>
ROBERT JENKS (C) CITIZENS' UTILITY BOARD OF OREGON	610 SW BROADWAY, STE 400 PORTLAND OR 97205 <a href="mailto:bob@oregoncub.org">bob@oregoncub.org</a>
ETTA LOCKEY PACIFICORP	825 NE MULTNOMAH ST., STE 1800 PORTLAND OR 97232 <a href="mailto:etta.lockey@pacificorp.com">etta.lockey@pacificorp.com</a>
BRADLEY MULLINS (C) MOUNTAIN WEST ANALYTICS	333 SW TAYLOR STE 400 PORTLAND OR 97204 <a href="mailto:brmullins@mwanalytics.com">brmullins@mwanalytics.com</a>
TYLER C PEPPE (C) DAVISON VAN CLEVE, PC	333 SW TAYLOR SUITE 400 PORTLAND OR 97204 <a href="mailto:tcp@dvclaw.com">tcp@dvclaw.com</a>
MICHAEL T WEIRICH (C) PUC STAFF--DEPARTMENT OF JUSTICE	BUSINESS ACTIVITIES SECTION 1162 COURT ST NE SALEM OR 97301-4096 <a href="mailto:michael.weirich@state.or.us">michael.weirich@state.or.us</a>

Dated: February 22, 2016



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Diane Henkels, Cleantech Law Partners PC