

Davison Van Cleve PC

Attorneys at Law

TEL (503) 241-7242 • FAX (503) 241-8160 • jog@dvclaw.com
Suite 400
333 SW Taylor
Portland, OR 97204

March 18, 2016

Via Electronic Filing

Public Utility Commission of Oregon
Attn: Filing Center
201 High St. SE, Suite 100
Salem OR 97301

Re: PORTLAND GENERAL ELECTRIC COMPANY
2017-2021 Renewable Portfolio Standard Implementation Plan
Docket No. UM 1755

Dear Filing Center:

Enclosed for filing in the above-referenced docket, please find the Motion to Amend Procedural Schedule on behalf the Industrial Customers of Northwest Utilities, the Oregon Public Utility Commission Staff, Portland General Electric Company, and the Citizens' Utility Board of Oregon (collectively, the "Joint Parties").

Thank you for your assistance. If you have any questions, please do not hesitate to call.

Sincerely,

/s/ Jesse O. Gorsuch
Jesse O. Gorsuch

Enclosure

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 1755

In the Matter of)	
)	
PORTLAND GENERAL ELECTRIC)	MOTION TO AMEND
COMPANY)	PROCEDURAL SCHEDULE
)	
2016 Renewable Portfolio Implementation)	EXPEDITED CONSIDERATION
Plan.)	REQUESTED
_____)	

I. INTRODUCTION

Pursuant to OAR 860-001-0420, the Industrial Customers of Northwest Utilities (“ICNU”), Oregon Public Utility Commission (“Commission”) Staff, Portland General Electric Company (“PGE”), and the Citizens Utility Board (“CUB”) (collectively, the “Joint Parties”) jointly file this motion to amend the schedule in the above-referenced proceeding. Because PGE’s response comments in this docket are due on March 18, 2016 under the existing procedural schedule, the Joint Parties request expedited consideration of this Motion.

II. MOTION

On February 16, 2016, PGE filed Supplemental Attachment A to its 2016 Renewable Portfolio Implementation Plan (“Implementation Plan”) in this docket. Supplemental Attachment A presents an “OCEP scenario” that details the Company’s incremental cost of compliance with Oregon’s renewable portfolio standard assuming the “Oregon Clean Electricity Plan,” then contained in House Bill 4036, was signed into law. The OCEP was eventually signed into law, with certain amendments, as Senate Bill 1547. Because the “OCEP scenario”

PGE provides in Supplemental Attachment A now reflects existing law, the Joint Parties have agreed that it would be in the public interest to modify the procedural schedule to allow Staff and intervenors to comment on PGE's Supplemental Attachment A in order to ensure development of a full record. Accordingly, the Joint Parties hereby move to modify the procedural schedule to as follows:

- April 15, 2016: Staff and intervenor supplemental comments addressing PGE's Supplemental Attachment A
- May 13, 2016: PGE Response comments to Staff and intervenor initial and supplemental comments

Consistent with these modifications, the Joint Parties agree that PGE will no longer file response comments on March 18, 2016 and, instead, will file one round of response comments addressing both rounds of Staff and intervenor comments.

Additionally, OAR 860-083-0400(8) states that "Commission staff should present its recommendation [on the Implementation Plan] at a Commission public meeting within 120 days of the implementation plan filing date." OAR 860-083-005(2) permits the Commission to waive any of its Division 083 rules for good cause shown. The Joint Parties further move that the Commission waive the 120-day requirement for presenting Staff's recommendation on PGE's Implementation Plan in order to allow sufficient time to develop a full record on PGE's Implementation Plan as it has been modified by the requirements of SB 1547.

III. CONCLUSION

For the foregoing reasons, the Joint Parties respectfully move that the Commission modify the procedural schedule in this docket as described above and waive the requirements of OAR 860-083-0400(8).

PAGE 2 – JOINT PARTIES' MOTION TO FILE SUPPLEMENTAL COMMENTS

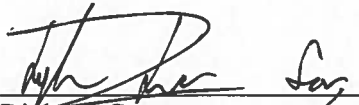
Dated this 18th day of March, 2016.

Respectfully submitted,

FOR COMMISSION STAFF:


Michael Weirich
Counsel for Commission Staff

FOR PGE:



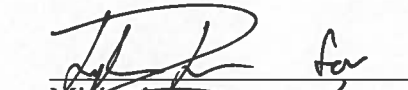
Richard George
Counsel for PGE

FOR ICNU



Tyler Pepple
Counsel for ICNU

FOR CUB:



Michael Goetz
Counsel for CUB

Dated this 18th day of March, 2016.

Respectfully submitted,

FOR COMMISSION STAFF:

Kaylie Kleen
for

Michael Weirich
Counsel for Commission Staff

FOR PGE:

Richard George
Counsel for PGE

FOR ICNU

Tyler Pepple
Counsel for ICNU

FOR CUB:

Michael Goetz
Counsel for CUB