

# Davison Van Cleve PC

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May 7, 2024

***Via Electronic Filing***

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

Re: In the Matter of ALLIANCE OF WESTERN ENERGY CONSUMERS,  
Investigation into Long-Term Direct Access Programs.  
**Docket No. UM 2024**

Dear Filing Center:

Please find enclosed the Alliance of Western Energy Consumers' Motion to Suspend Procedural Schedule in the above-referenced docket.

Thank you for your assistance. Please do not hesitate to contact me if you have any questions.

Sincerely,

/s/ Nannette M. Moller  
Nannette M. Moller

Enclosure

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**UM 2024**

In the Matter of	)	MOTION TO SUSPEND PROCEDURAL
	)	SCHEDULE OF THE ALLIANCE OF
ALLIANCE OF WESTERN ENERGY	)	WESTERN ENERGY CONSUMERS
CONSUMERS,	)	
	)	
Petition for a General Investigation into Long-	)	
Term Direct Access Programs.	)	
_____	)	

**I. INTRODUCTION**

Pursuant to OAR § 860-001-0420 the Alliance of Western Energy Consumers (“AWEC”) respectfully submits this Motion for Suspension of Procedural Schedule in Docket No. UM 2024 with the Oregon Public Utility Commission (“Commission”). In accordance with OAR § 860-001-0420(2) AWEC has conferred with the parties to this proceeding. The following parties support this motion: PacifiCorp, Portland General Electric Company, the Oregon Citizens’ Utility Board, and NewSun Energy. The following parties do not oppose this motion: Commission Staff, Calpine Solutions, Northwest and Intermountain Power Producers Coalition, Brookfield Renewable Trading and Marketing LLP, and Walmart. No party has indicated that they oppose this motion.

**II. DISCUSSION**

Given the press of business before the Commission at this time, AWEC requests a six-month suspension of this docket’s procedural schedule. Suspension is reasonable so that parties

and the Commission may focus the necessary time and resources on time-sensitive proceedings with statutory deadlines. It will also give parties additional time to formulate and negotiate settlement proposals on some or all outstanding issues in this proceeding. Finally, suspension of this docket’s procedural schedule will not prejudice any party. Accordingly, AWEC conditionally proposes the following modified dates, which would result from a six-month suspension of the current procedural schedule:

<b>Event</b>	<b>Current Schedule</b>	<b>Proposed Schedule</b>
Opening testimony due	5/17/24	11/18/24
Cross answering/reply testimony due	7/19/24	1/20/25
Closing testimony due	9/30/24	3/31/25
Evidentiary Hearing	10/28/24	4/28/25
Opening Briefs	12/6/24	6/6/25
Closing Briefs	1/12/25	7/14/25
Target Order date	2/28/25	8/28/25

The dates proposed above are contingent on party and Commission availability, and AWEC is open to modifying any of the dates above as necessary to accommodate scheduling conflicts.

### **III. CONCLUSION**

For the reasons set forth above, AWEC respectfully request the Commission grant a six-month suspension of this docket.

Dated this 7th day of May 2024.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Tyler C. Pepple

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