BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

UM 2032

In the Matter of

PUBLIC UTILITY COMMISSION OF OREGON,

Investigation into the Treatment of Network Upgrade Costs for Qualifying Facilities NEWSUN ENERGY LLC MOTION FOR AN EXTESION OF TIME TO FILE MOTION TO ADMIT PRE-FILED TESTIMONY AND EXHIBITS

Pursuant to OAR 860-001-0420, NewSun Energy LLC ("NewSun") respectfully requests an extension of the January 17, 2023 due date for the admission of the pre-filed testimony and exhibits into the record as evidence in this proceeding. On Thursday, January 12, 2023, the Oregon Public Utility Commission ("Commission") filing center circulated an email directing parties to file motions to admit pre-filed testimony and exhibits along with supporting declarations or affidavits into the record by Tuesday, January 17th, only two business days later (Monday, January 16 is a holiday). NewSun requests an extension to January 24, 2023.

NewSun contacted parties in this case and as of the filing, no party has indicated any opposition to this request. The Community Renewable Energy Association and Oregon Solar + Storage Industry Association support the request and the following parties indicated either no objection or no opposition to the request: Staff, Renewable Energy Coalition, the Northwest & Intermountain Power Producers Coalition, Obsidian

Renewables, Alliance for Western Energy Consumers, Idaho Power Company, Portland General Electric Company, and PacifiCorp.

NewSun has four witnesses in this matter, all of whom are outside consultants or industry professionals not employed by NewSun and who NewSun has not been in contact with for many months regarding this docket. Due to the press of other business and the need to coordinate contacting and obtaining declarations or affidavits from its four witnesses, a couple business days including over a holiday weekend is not sufficient time to gather all this up. As such, NewSun seeks an extension of this deadline to Tuesday, January 24, 2023.

Dated this 13th day of January 2023.

Respectfully submitted,

NewSun Energy LLC

/s/ Marie P. Barlow

Marie P. Barlow, In-House Counsel, Policy & Regulatory Affairs NewSun Energy LLC mbarlow@newsunenergy.net