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June 4, 2021

VIA ELECTRONIC FILING

Attention: Filing Center
Public Utility Commission of Oregon
P.O. Box 1088
Salem, Oregon 97308-108

Re: Docket No. UM 2032 – Investigation into the Treatment of Network Upgrade Costs for Qualifying Facilities

Attention Filing Center:

Attached for filing in the above-captioned docket is Joint Utilities' Motion for Extension of Time. The Joint Utilities' respectfully request expedited consideration of this Motion.

Please contact this office with any questions.

Thank you,

Jennifer Miller
Legal Assistant

Attachment

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 2032

In the Matter of

PUBLIC UTILITY COMMISSION OF
OREGON,

Investigation into Treatment of Network
Upgrade Costs for QFs

**JOINT UTILITIES' MOTION FOR
EXTENSION OF TIME**

***EXPEDITED CONSIDERATION
REQUESTED***

1 Pursuant to OAR 860-001-0420, Portland General Electric Company (PGE), PacifiCorp
2 dba Pacific Power (PacifiCorp), and Idaho Power Company (Idaho Power) (together, the Joint
3 Utilities) respectfully request an extension of time to file their response to NewSun
4 Energy LLC's (NewSun) Motion to Compel Discovery (Motion) filed on May 28, 2021. In
5 accordance with OAR 860-001-0420(4) and (5), the Joint Utilities' response is currently due
6 June 14, 2021, and NewSun's reply is due June 21, 2021. The Joint Utilities request additional
7 time to file their response because critical personnel are out of the office this week and because
8 of the general press of business.

9 After conferring with NewSun and the parties to this docket, the Joint Utilities request
10 that the Administrative Law Judge adopt the following deadlines for filing responses and replies
11 to the Motion:

- 12 • Responses from any party filed by June 28, 2021; and
- 13 • Replies from any party filed by July 20, 2021.

14 This case has been stayed since January 21, 2021, and therefore the proposed extensions
15 will not require any additional modifications to the procedural schedule.

1 The Joint Utilities request expedited consideration of this request given that their
2 response is currently due June 14, 2021. In accordance with OAR 860-001-0420(6)(a), the Joint
3 Utilities contacted the parties to Docket UM 2032 on June 3, 2021, to solicit their positions on
4 this request. Staff, Alliance of Western Energy Consumers (AWEC), NewSun, the Renewable
5 Energy Coalition (REC), the Community Renewable Energy Coalition (CREA), the Northwest
6 and Intermountain Power Producers Coalition (NIPPC), and Obsidian Renewables LLC, have
7 affirmatively stated that they do not object to this request. No other party responded with an
8 objection.

DATED: June 4, 2021.

McDOWELL RACKNER GIBSON PC



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