

BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

UM 2086

RIVER VALLEY SOLAR, LLC,

Complainant,

vs.

PORTLAND GENERAL ELECTRIC
COMPANY,

Defendant.

JOINT MOTION TO STAY PROCEEDING

Portland General Electric Company (“PGE”) and River Valley Solar, LLC (“River Valley”) hereby file this Joint Motion to Stay this Proceeding until August 31, 2020. PGE and River Valley are parties to a Settlement Agreement filed as a supplemental filing to Advice No. 20-09, Schedule 136, dated May 14, 2020 (“Settlement Agreement”). PGE and River Valley are also parties to a Public Utility Regulatory Policies Act (“PURPA”) standard power purchase agreement (the “PPA”). The complaint in this docket concerns River Valley’s desire to terminate the PPA and participate in the Community Solar Program (“CSP”). Under the Settlement Agreement, PGE agreed to offer an option to terminate the PPA and that certain surviving provisions (namely section 9.5) of the terminated PPA would not apply to any CSP power purchase agreement, and River Valley agreed to request that this docket be stayed if the Commission approved PGE’s Schedule 136. PGE and River Valley confirm that the Commission’s actions at the May 19, 2020 public meeting are sufficient to constitute approval of PGE’s Schedule 136 for the purpose of the Settlement Agreement.

Accordingly, PGE and River Valley request that this docket be stayed until August 31, 2020.

DATED this 26th day of May, 2020.

Respectfully submitted,

PORTLAND GENERAL ELECTRIC COMPANY

/s/ David F. White

David F. White, OSB No. 011382
Assistant General Counsel
Portland General Electric Company
121 SW Salmon Street, 1WTC1301
Portland, OR 97204
Telephone: (503) 464-7701
Fax: (503) 464-2200
Email: david.white@pgn.com

Lisa Rackner
McDowell Rackner Gibson PC
419 SW 11th Avenue, Suite 400
Portland, OR 97205
Telephone: (503) 595-3922
Fax: (503) 595-3928
Email: dockets@mrg-law.com

RIVER VALLEY SOLAR, LLC

/s/ Irion Sanger

Irion Sanger
Joni Sliger
Sanger Law PC
1041 SE 58th Place
Portland, OR 97215
Telephone: (503) 756-7533
Fax: (503) 334-2235
Email: irion@sanger-law.com