

# Davison Van Cleve PC

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October 21, 2021

***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  
AND CITIZENS' UTILITY BOARD OF OREGON,  
Application for an Accounting Order Requiring Portland General Electric  
Company to Defer Expenses and Capital Costs Associated with the  
Boardman Power Plant, **Docket No. UM 2119**  
In the Matter of PORTLAND GENERAL ELECTRIC COMPANY,  
Request for a General Rate Revision, **Docket No. UE 394**

Dear Filing Center:

Please find enclosed the Joint Motion for Leave to File Reply to PGE's Response on behalf of the Alliance of Western Energy Consumers and the Oregon Citizens' Utility Board in the above-referenced proceedings.

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 2119**

**UE 394**

In the Matter of	)	
	)	
ALLIANCE OF WESTERN ENERGY	)	JOINT MOTION TO FOR LEAVE TO
CONSUMERS and OREGON CITIZENS'	)	FILE REPLY TO PGE'S RESPONSE OF
UTILITY BOARD,	)	WESTERN ENERGY CONSUMERS
	)	AND OREGON CITIZENS' UTILITY
Application for an Accounting Order Requiring	)	BOARD
Portland General Electric Company to Defer	)	
Expenses and Capital Costs associated with the	)	
Boardman Power Plant.	)	
_____	)	
	)	
In the Matter of	)	
	)	
PORTLAND GENERAL ELECTRIC	)	
COMPANY,	)	
	)	
Request for a General Rate Revision.	)	
_____	)	

Pursuant to OAR § 860-001-0420(5), the Alliance of Western Energy Consumers (“AWEC”) and Oregon Citizens’ Utility Board (“CUB”) hereby move the Oregon Public Utility Commission (“Commission”) to permit AWEC and CUB to file a Reply to Portland General Electric Company’s (“PGE” or “Company”) Response to AWEC and CUB’s Joint Motion to Consolidate Docket Nos. UM 2119 and UE 394. AWEC and CUB are concurrently filing their Reply with this Motion.

Good cause exists to permit AWEC and CUB to reply to PGE’s Response so that the Commission has a complete record on which to render a decision on AWEC and CUB’s Joint

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Motion to Consolidate.

WHEREFORE, AWEC and CUB respectfully request that the Commission grant this Motion for Leave to File a Reply to PGE's Response to AWEC and CUB's Joint Motion to Consolidate.

Dated this 21st day of October, 2021.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Tyler C. Pepple

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/s/ Michael P. Goetz

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RESPONSE

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