

**BEFORE THE PUBLIC UTILITY COMMISSION**

**OF OREGON**

**UM 2274**

In the Matter of

PORTLAND GENERAL ELECTRIC  
COMPANY

2023 All-Source Request for Proposals,  
Request for Partial Waiver of  
Competitive Bidding Rules

NORTHWEST & INTERMOUNTAIN  
POWER PRODUCERS  
COALITION’S MOTION FOR  
EXTENSION OF TIME TO FILE  
EXPERT REPORT

EXPEDITED CONSIDERATION  
REQUESTED

**I. MOTION**

In accordance with OAR 860-001-0420, the Northwest & Intermountain Power Producers Coalition (“NIPPC”) files this motion for an extension of time to file an expert report in response to Portland General Electric Company’s (“PGE’s”) 2023 Request for Proposals (“RFP”) Final Draft. NIPPC will submit its substantive comments responding to PGE’s 2023 RFP Final Draft today, and it not seeking an extension of time to file those comments.

Comments on PGE’s 2023 RFP are due today and NIPPC had intended to attach an expert report on the issue of the imputed debt adder from Michael Gorman. On June 5, 2023, NIPPC sent its 5<sup>th</sup> Set of Data Requests to PGE, which contained several questions on imputed debt. NIPPC asked for responses back by June 12, 2023 so that NIPPC could incorporate the responses into the expert report. NIPPC also asked for responses back on a rolling basis with priority for data requests 27, 30, and 31. NIPPC intends for the imputed debt report to be very similar to an expert report NIPPC filed in Idaho Power Company’s RFP in Docket No. UM 2255, but revised to incorporate and

respond directly to PGE's specific proposal on imputed debt. On June 14, 2023, NIPPC provided a copy of the Idaho Power report to PGE and informed PGE that it intended to file a similar report in this proceeding.

NIPPC intended to review and incorporate PGE's responses in the expert report. Therefore, NIPPC requests a two-business day extension of time until June 21 to file its expert report to incorporate the responses into the report. If PGE does not respond by June 19, then NIPPC would request an additional extension to ensure that it has two business days after it receives PGE's responses to NIPPC's 5<sup>th</sup> Set of Data Requests to file its expert report. Because NIPPC's report would otherwise be due today, NIPPC requests expedited consideration of this motion.

NIPPC sought to confer with all parties of record to this proceeding. PGE, the Alliance for Western Energy Consumers, and Oregon Public Utility Commission Staff, do not oppose the extension of time. NIPPC has not heard back from the other parties. As of the date of filing, NIPPC is not aware of any objection to the proposed motion.

Dated this 16th day of June 2023.

Respectfully submitted,

Sanger Law, PC

*Ellie Hardwick*

Ellie Hardwick  
Irion A. Sanger  
Sanger Law, PC  
4031 SE Hawthorne Blvd.  
Portland, Oregon 97214  
Telephone: 336-337-0381  
Fax: 503-334-2235  
ellie@sanger-law.com

Of Attorneys for Northwest &  
Intermountain Power Producers Coalition