

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 2274

In the Matter of

PUBLIC UTILITY COMMISSION OF
OREGON,

2023 ALL-SOURCE REQUEST FOR
PROPOSALS.

MOTION TO CHANGE
PROCEDURAL SCHEDULE

**(EXPEDITED CONSIDERATION
REQUESTED)**

NewSun Energy LLC (“NewSun”) hereby moves to modify the procedural schedule for this docket to extend the date for comments on the Staff Report. Currently, comments on the Staff Report are due on December 19, 2023. The Staff Report is a comprehensive document addressing technical and complicated issues. Because of the detailed nature of the Staff Report, NewSun needs additional time to prepare meaningful comments on the Staff Report. NewSun requests that the date for comments on the Staff report be extended to December 22, 2023, at 12:00 p.m.

NewSun notified interested parties of its intent to request this change to the schedule by email at approximately 3:45 p.m. on December 18, 2023. OSSIA and BrightNight have responded saying that they do not oppose the request. PGE also indicated that it did not oppose extension until December 22, but would oppose a longer extension. Staff responded indicating that they have no objection to a short extension, such as December 21st at 3:00 p.m., but would oppose a longer extension. Due to the need to file this motion on an expedited basis, NewSun was unable to confer further with parties. NewSun requests expedited consideration of this motion.

All other dates on the schedule set in the November 2, 2023 ruling would remain the same, including the January 4, 2023 public meeting.

Dated this 19th day of December 2023.

Respectfully submitted,

s/Richard Lorenz
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