

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**UM 1829, UM 1830, UM 1831, UM 1832, UM 1833 – PHASE II**

BLUE MARMOT V LLC (UM 1829),  
BLUE MARMOT VI LLC (UM 1830),  
BLUE MARMOT VII LLC (UM 1831),  
BLUE MARMOT VIII LLC (UM 1832),  
and  
BLUE MARMOT IX LLC (UM 1833),

Complainants,

v.

PORTLAND GENERAL ELECTRIC  
COMPANY,

Defendant.

RESPONSE TO PGE’S REQUEST  
FOR EXPEDITED CONSIDERATION  
OF ITS SECOND MOTION TO  
COMPEL

***EXPEDITED CONSIDERATION***

Blue Marmot V, LLC, Blue Marmot VI, LLC, Blue Marmot VII, LLC, Blue Marmot VIII, LLC, and Blue Marmot IX, LLC (collectively the “Blue Marmots”) file this response to Portland General Electric Company’s (“PGE’s”) request for expedited consideration of its second motion requesting that the Oregon Public Utility Commission (the “Commission”) Administrative Law Judge (“ALJ”) compel the Blue Marmots to produce certain data (“PGE’s Motion”). The Blue Marmots oppose PGE’s Motion but agree with the ALJ that it is “incumbent upon the parties and the Commission to keep further delays due to litigation to a minimum.”<sup>1</sup> In support of this aim, the Blue Marmots propose to file their response to PGE’s Motion ahead of schedule on March 11, 2020. The Blue Marmots have conferred with PGE, and PGE opposes

---

<sup>1</sup> ALJ Ruling at 2 (Feb. 24, 2020).

this schedule. However, the Blue Marmots believe this date reflects the earliest reasonable date, given the press of business.

Dated this 4th day of March 2020.

Respectfully submitted,



---

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

Of Attorneys for Blue Marmot V, LLC, Blue Marmot VI, LLC, Blue Marmot VII, LLC, Blue Marmot VIII, LLC, and Blue Marmot IX, LLC