

Via eDockets

October 7, 2021

The Honorable Christopher Allwein
Public Utility Commission of Oregon
PO Box 1088
Salem, OR 97308-1088
puc.filingcenter@puc.oregon.gov

**Re: Waconda Solar v. Portland General Electric Co.
Docket No. UM 1971**

Dear Judge Allwein,

Waconda Solar, LLC (“Waconda Solar”) submits this reply to Portland General Electric Company’s (“PGE’s”) response to Waconda Solar’s proposed schedule regarding: 1) PGE’s response to Waconda Solar’s motion to stay; and 2) Waconda Solar’s response to PGE’s modified motion for summary judgment.

Waconda Solar is not opposed to providing PGE with the full time in the Oregon administrative rules regarding responses to substantive motions like the motion to stay.

Waconda Solar’s position is premised, however, on the Oregon Public Utility Commission (the “Commission”) ruling on its motion to stay prior to when Waconda Solar needs to file its response to the modified summary judgment. Specifically, Waconda Solar is opposed to Waconda Solar being required to file its response to PGE’s modified summary judgment as early as November 9, 2021.

Waconda Solar has requested that its response to PGE’s modified summary judgment not be due until after the Commission rules on whether Waconda Solar needs to file its response to the modified motion for summary judgment. In contrast, PGE wants Waconda Solar to file its response to the modified summary judgment before the Commission decides even if it needs to file the response.

PGE filed its first motion for summary judgment on July 23, 2019, which includes many of the same substantive arguments. PGE has removed Waconda Solar from the interconnection queue. There is no advantage or harm to PGE by additional delay.

Sincerely



Irion A. Sanger