



**Portland General Electric Company**  
*Legal Department*  
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**V. Denise Saunders**  
*Associate General Counsel*

August 9, 2017

***Via Electronic Filing***

Public Utility Commission of Oregon  
Filing Center  
201 High St SE, Suite 100  
PO Box 1088  
Salem OR 97308-1088

Re: **UM 1854 – PORTLAND GENERAL ELECTRIC COMPANY's Application to  
Lower the Standard Price and Standard Contract Eligibility Cap for Solar  
Qualifying Facilities**

Attention Filing Center:

Enclosed for filing is an electronic copy of Portland General Electric Company's (PGE)  
Response in Opposition to Strata Solar Development, LLC's Petition to Allow Sur-Reply.

Thank you in advance for your assistance.

Sincerely,

A handwritten signature in blue ink, reading "V. Denise Saunders". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

V. Denise Saunders  
Associate General Counsel

VDS:bop

Enclosures

**BEFORE THE PUBLIC UTILITY COMMISSION**

**OF OREGON**

UM 1854

In the Matter of

PORTLAND GENERAL ELECTRIC  
COMPANY

Application to Lower the Standard Price and  
Standard Contract Eligibility Cap for Solar  
Qualifying Facilities.

**PORTLAND GENERAL ELECTRIC  
COMPANY’S RESPONSE IN  
OPPOSITION TO STRATA SOLAR  
DEVELOPMENT, LLC’S PETITION  
TO ALLOW SUR-REPLY**

Portland General Electric Company (“PGE”) respectfully requests that the Public Utility Commission of Oregon (“Commission”) deny Strata Solar Development, LLC’s (“Strata”) August 7, 2017 petition to allow sur-reply. Contrary to Strata’s assertion, PGE did not “first raise the issue of timeliness in its Reply ....”<sup>1</sup> PGE was replying to Commission Staff, which raised the issue in its response to PGE’s motion for interim relief.<sup>2</sup> Staff raised the issue because of PGE’s response to a July 14, 2017 data request from Strata.<sup>3</sup> Like Staff, Strata could have addressed the issue in its response to PGE’s motion for interim relief. Strata should not be allowed to file a second response in the form of an unauthorized sur-reply. Regarding the

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<sup>1</sup> Docket No. UM 1854, Strata Solar’s Petition to Allow its Sur-Reply at 2 (Aug. 7, 2017).

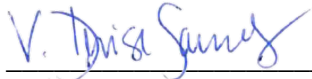
<sup>2</sup> Docket No. UM 1854, Staff’s Response to PGE’s Motion for Interim Relief at 6 (Jul. 27, 2017).

<sup>3</sup> *Id.* (Staff attached a copy of PGE’s July 19, 2017 response to Strata’s July 14, 2017 Data Request No. 10 in which PGE stated: “PGE is currently processing Schedule 201 standard contract requests from solar facilities in accordance with the Schedule 201 timelines. PGE has requested changes in eligibility criteria, including interim changes, effective June 30, 2017. PGE does not expect to provide executable Standard PPAs prior to Commission ruling on PGE’s motion for interim relief.”).

substance of the sur-reply: PGE denies the assertion that it does not follow Schedule 201.<sup>4</sup>

Dated this 9<sup>th</sup> day of August 2017.

Respectfully submitted,



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/s/ Jeffrey S. Lovinger

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<sup>4</sup> Docket No. UM 1854, Affidavit of John Knight in Support of Strata Solar's Sur-Reply at 2 (Aug. 7, 2017).