

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**NC 405**

PUBLIC UTILITY COMMISSION OF  
OREGON,

Complainant,

vs.

City of Portland, acting by and through its  
Bureau of Environmental Services,

Defendant.

**DEFENDANT'S MOTION FOR AN  
EXTENSION OF TIME**

**DEFENDANT'S MOTION FOR AN EXTENSION OF TIME**

Defendant City of Portland moves the Commission for an extension of 45 days within which to file its answer in the above-referenced matter.

The Complaint was filed on February 23, 2023, and served on Defendant February 24, 2023. Defendant's answer is currently due on March 16, 2023. If granted, the new due date would be Monday, May 1, 2023, because the 45th day falls on a Sunday. This is Defendant's first request for an extension of time in this case.

Defendant also requests expedited consideration of this motion.

I have contacted opposing counsel, Senior Assistant Attorney General Stephanie Andrus, and she has informed me that she does not object to this

request for an extension of time or to the Commission's expedited consideration of this motion.

Dated this 10<sup>th</sup> day of March, 2023.

Respectfully submitted,

/s/ Eric Shaffner

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Eric Shaffner, OSB No. 081238

Deputy City Attorney

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