

Portland General Electric Company Legal Department 121 SW Salmon Street • Portland, Oregon 97204 503-464-8926 • Facsimile 503- 464-2200 **Douglas C. Tingey** Associate General Counsel

August 14, 2018

Via Electronic Filing

Public Utility Commission of Oregon Attention: Filing Center P.O. Box 1088 Salem, OR 97308-1088

Re: UE 335 - PORTLAND GENERAL ELECTRIC COMPANY, Request for a General Rate Revision

Dear Filing Center:

Enclosed for filing in the above-referenced docket is Portland General Electric Company's Motion to Modify Procedural Schedule. Please note that PGE requests expedited consideration.

Thank you for your assistance.

Sincerely,

Douglas C. Tingey Associate General Counsel

DCT:hp Enclosure

BEFORE THE PUBLIC UTILITY COMMISSION OF THE STATE OF OREGON

UE 335

In the Matter of

PORTLAND GENERAL ELECTRIC COMPANY,

Request for a General Rate Revision.

MOTION TO MODIFY PROCEDURAL SCHEDULE

EXPEDITED CONSIDERATION REQUESTED

Pursuant to OAR 860-001-0420(2), Portland General Electric Company ("PGE") hereby moves the Administrative Law Judge for an order modifying the procedural schedule in this docket regarding issues related to direct access.

Some parties in this docket have reached a settlement of all direct access issues raised in this docket. At least one party will not be joining the stipulation and intends to oppose the settlement. The parties that have reached settlement of direct access issues are: PGE, Staff of the Public Utility Commission of Oregon ("Staff"), Fred Meyer Stores and Quality Food Centers, Division of The Kroger Co. ("Kroger"), Albertsons Companies, Inc. ("Albertsons"), and Calpine Energy Solutions, LLC ("Calpine") (collectively the "Settling Parties"). The Alliance of Western Energy Consumers ("AWEC") is aware of the settlement terms and has indicated that it will oppose at least part of the settlement. Other parties may also oppose all or part of the settlement, or remain neutral. All parties that raised direct access issues have participated in the settlement discussions and are aware of the terms of the settlement and this motion.

The procedural schedule adopted at the beginning of this case calls for Staff and Intervenors to file rebuttal testimony tomorrow, August 15, 2018. Due to the settlement, the Settling Parties and AWEC request that the procedural schedule be amended such that Staff and Intervenors do not need to address direct access related issues in their rebuttal testimony to be

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filed tomorrow. The parties have also conferred on a proposed schedule to address the direct access settlement and request that the ALJ adopt the following schedule for direct access issues only:

August 20: Direct access stipulation and joint testimony filed
September 4: Objections and testimony by AWEC, and possibly others, filed
September 17: Settling parties' response testimony filed
September 28: Cross-examination statements and cross-exhibits due
Week of October 1: Hearing (depending on Commissioner and ALJ availability)
October 19: Simultaneous opening briefs due
October 26: Simultaneous closing briefs due

All issues other than direct access issues will remain on the previously adopted schedule, and no change in that schedule is requested.

Staff, Albertson's, Calpine, AWEC, Oregon Citizens' Utility Board, and Northwest and Intermountain Power Producers Coalition support this motion. PGE has not received a response from Kroger today regarding this motion, but believes it will be supportive. PGE is not aware of any opposition to the motion.

As discussed above, under the current procedural schedule in this docket, Staff and Intervenors' rebuttal testimony is due on August 15, 2018. Accordingly, PGE requests expedited consideration of this motion.

DATED this 14th day of August, 2018.

Respectfully submitted,

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