
January 3, 2024

Via Electronic Filing

Public Utility Commission of Oregon
Attn: Filing Center
201 High St. SE, Suite 100
Salem, OR 97301
puc.filingcenter@puc.oregon.gov

Re: Docket No. UE 428 – Samuel Drevo’s Amended Request for Extension of Time to Reply to PacifiCorp’s Partial Objection to Samuel Drevo’s Petition to Intervene

Attention Filing Center,

Please find attached for filing in the above-referenced proceeding Samuel Drevo’s Amended Request for Extension of Time to Reply to PacifiCorp’s Partial Objection to Samuel Drevo’s Petition to Intervene.

Counsel for Mr. Drevo respectfully requests a seven-day extension of time to reply to PacifiCorp d/b/a Pacific Power’s Partial Objection to Samuel Drevo’s Petition to Intervene in this proceeding for the reasons set forth in the filing below

Thank you for your assistance. Please do not hesitate to contact me with any questions regarding this filing. Mr. Drevo can be contacted via his attorney, listed in the petition below.

Thank you,

/s/ Matthew J. Preusch

Matthew J. Preusch, OSB No. 134610
KELLER ROHRBACK L.L.P.
801 Garden Street, Suite 301
Santa Barbara, CA 93101
Tel: (805) 456-1496
mpreusch@kellerrohrback.com

Counsel for Samuel Drevo and *James* Plaintiffs

BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON

UE 428

In the Matter of
PACIFICORP, dba PACIFIC POWER,
Advice No. 23-018 (ADV 1545),
Modifications to Rule 4, Application for
Electrical Service.

**AMENDED REQUEST FOR
EXTENSION OF TIME TO REPLY TO
PACIFICORP'S PARTIAL
OBJECTION TO SAMUEL DREVO'S
PETITION TO INTERVENE**

On December 18, Samuel Drevo filed his petition to intervene in this proceeding, individually and on behalf of the certified class in *James v. PacifiCorp*. PacifiCorp filed a partial objection on December 28, 2023. Under OAR 860-001-0300(5), Mr. Drevo's reply is due seven (7) days after PacifiCorp's partial objection was filed, on January 4, 2024.

Pursuant to the authority delegated to the Administrative Law Judge by OAR 860-001-0090(h), Petitioner respectfully requests a brief seven (7) day extension of time—until January 11, 2024—to file his reply. Good cause exists to grant this extension. Petitioner's counsel is currently preparing for the first consolidated damages trial in the *James* matter, which begins on January 8. Given the demands of the pretrial schedule in the *James* case as well as the intervening New Year's holiday, the requested extension would afford petitioner a sufficient opportunity to prepare his reply.

A short seven-day extension of time will not unreasonably delay this proceeding, nor will it prejudice any of the parties. It will, however, permit petitioner sufficient time to provide a fulsome reply.

Pursuant to OAR 860-001-0420, counsel made a good faith effort to confer with the parties to this matter and they have not objected to our filing of this Request.¹

¹ The undersigned had not received a response from party Idaho Power Company as of filing. DREVO'S REQUEST FOR EXTENSION- 1

RESPECTFULLY SUBMITTED this 3rd day of January, 2024.

KELLER ROHRBACK L.L.P.

By /s/ Matthew J. Preusch
Matthew J. Preusch, OSB No. 134610

801 Garden Street, Suite 301
Santa Barbara, CA 93101
Tel: (805) 456-1496
Fax: (206) 623-3384
mpreusch@kellerrohrback.com

Sarah R. Osborn, OSB No. 222119
KELLER ROHRBACK L.L.P.
601 SW 2nd Ave., Suite 1900
Portland, OR 97204
Tel: (206) 623-1900
sosborn@kellerrohrback.com

Cody Berne, OSB No. 142797
STOLL STOLL BERNE LOKTING
& SHLACHTER P.C.
209 SW Oak Street, Suite 500
Portland, OR 97204
Tel: (503) 227-1600
Fax: (503) 227-6840
cberne@stollberne.com

Attorneys for Petitioner and the James class