Douglas C. Tingey Assistant General Counsel

March 15, 2011

Via Electronic Filing and U.S. Mail

Oregon Public Utility Commission Attention: Filing Center 550 Capitol Street NE, #215 PO Box 2148 Salem OR 97308-2148

Re: UM 1514

Attention Filing Center:

Enclosed for filing in the captioned docket are an original and two copies of:

• MOTION TO SUSPEND THE PROCEDURAL SCHEDULE [EXPEDITED CONSIDERATION REQUESTED]

This is being filed by electronic mail with the Filing Center. An extra copy of the cover letter is enclosed. Please date stamp the extra copy and return to me in the envelope provided.

Thank you in advance for your assistance.

Sincerely,

DOUGLAS C. TINGEY

Assistant General Counsel

DCT:cbm Enclosures

BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON

UM 1514

| In the Matter of |) | |
|---|---|--------------------------|
| |) | MOTION TO SUSPEND THE |
| PORTLAND GENERAL ELECTRIC |) | PROCEDURAL SCHEDULE |
| COMPANY |) | |
| |) | [EXPEDITED CONSIDERATION |
| Application for Deferral of Incremental Costs |) | REQUESTED] |
| Associated with Automated Demand Response |) | |

Pursuant to OAR 860-013-0031, Portland General Electric ("PGE") requests that the schedule set in this docket be suspended. PGE, Staff of the Public Utility Commission ("Staff"), and the Citizens' Utility Board ("CUB") (collectively the "Settling Parties"), have reached a settlement in principle of all issues in this docket. Industrial Customers of Northwest Utilities ("ICNU") has indicated it may oppose part of the settlement. The Settling Parties are in the process of drafting a Stipulation and supporting joint testimony to be submitted to the Commission.

Under the current schedule in this docket, PGE testimony is due March 15, 2011.

Subsequent dates for staff and intervenor testimony, PGE reply testimony and a hearing are also set. PGE, with the support of the other Settling Parties, requests that these deadlines be suspended. The Parties will endeavor to submit a Stipulation as soon as possible for Commission consideration.

EXPEDITED CONSIDERATION REQUEST

For the reasons discussed above, PGE requests that the administrative law judge issue an order suspending the schedule in this docket. Since under the current schedule testimony is due from PGE today, expedited consideration of this motion is requested. The Settling Parties Page 1 – MOTION TO SUSPEND THE PROCEDURAL SCHEDULE

support the motion. ICNU does not object to this motion.

DATED this 15th day of March, 2011.

Respectfully submitted,

Douglas C. Tingey, OSB No. 044366

Assistant General Counsel

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CERTIFICATE OF SERVICE

I hereby certify that I have this day caused MOTION TO SUSPEND THE

PROCEDURAL SCHEDULE [EXPEDITED CONSIDERATION REQUESTED] to be
served by electronic mail to those parties whose email addresses appear on the attached service
list for OPUC Docket No. UM 1514.

Dated at Portland, Oregon, this $15^{\rm th}$ day of March, 2011.

DOUGLAS C. TINGEY, OSB #044366

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SERVICE LIST DOCKET UM 1514

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