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March 24, 2020

VIA ELECTRONIC FILING

Attention: Filing Center
Public Utility Commission of Oregon
201 High Street SE, Suite 100
P.O. Box 1088
Salem, Oregon 97308-1088

**Re: Docket UM 1829, Phase II – In the Matter of Blue Marmots, LLC vs Portland
General Electric Company**

Attention Filing Center:

Attached for filing in the above-captioned docket is Portland General Electric Company's Motion for Extension of Time to File its Response Testimony.

Please contact this office with any questions.

Sincerely,

/s/ Alisha Till

Alisha Till
Paralegal

Attachment

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 1829 – PHASE II

Blue Marmot V LLC
Blue Marmot VI LLC
Blue Marmot VII LLC
Blue Marmot VIII LLC
Blue Marmot IX LLC,
Complainants,

v.

Portland General Electric Company,
Defendant.

**PORTLAND GENERAL ELECTRIC
COMPANY’S MOTION FOR
EXTENSION OF TIME TO FILE
RESPONSE TESTIMONY**

Expedited Consideration Requested

1 Pursuant to OAR 860-001-0420, Portland General Electric Company (PGE or Company)
2 moves the Public Utility Commission of Oregon (Commission) for an order extending the deadline
3 for its Response Testimony, which is currently scheduled for March 30, 2020. PGE requests that
4 the extension be granted for an indefinite period. Once the above-captioned Blue Marmot LLCs
5 (collectively, the Blue Marmots) provide all documents sought in PGE’s Motion to Compel, and
6 PGE has the opportunity to review the documents provided and assess whether any follow-up
7 discovery is necessary, PGE will request a new deadline for its Response Testimony.

8 In its Motion to Compel, PGE explained that the information sought is required in order
9 for PGE to develop its positions and to prepare its Response Testimony. Importantly, the Response
10 Testimony is PGE’s only opportunity to introduce evidence in this Phase II of UM 1829, and so it
11 is critical that PGE have all information that it might wish to present to the Commission to support
12 its case. PGE’s Motion to Compel was granted on March 18, 2020. Since the evening of March
13 20, PGE has received over 500 emails responsive to DRs 1, 4, and 12. PGE has begun reviewing
14 the documents produced to date, but anticipates that it will take several days to evaluate how these
15 responses will impact its testimony and whether any follow-up DRs will be required. Most
16 importantly, six days after the documents were ordered to be produced, the Blue Marmots have

1 not yet provided any documents responsive to DR 8. (The Blue Marmots have stated that they
2 “hope” to provide these documents by today, but have not confirmed that they will do so.) And
3 given the subject matter of DR 8, which requests information regarding Blue Marmots’ expected
4 profits from their projects, PGE anticipates that it will take a significant amount of time to review
5 that information as well.

6 While PGE has worked diligently on its Response Testimony to-date, it cannot complete
7 that testimony until it has an opportunity to review the requested documents, serve any follow-up
8 discovery requests, and then develop testimony based on the information received. For this reason,
9 PGE requests that the Commission suspend the current deadline for its Response Testimony. Once
10 all of the ordered information has been provided, PGE will evaluate how much time it will need
11 to complete its testimony and request a specific deadline.

12 Based on past conversations with the Blue Marmots, PGE believes that they would oppose
13 this request for extension but they have not confirmed that that is the case.

Dated: March 24, 2020

MCDOWELL RACKNER GIBSON PC

/s/ Lisa Rackner

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