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November 20, 2018

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 – In the Matter of Blue Marmot V 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 to Blue Marmots' Motion for Stay.

Please contact this office with any questions.

Sincerely,

A handwritten signature in blue ink that reads 'Alisha Till'.

Alisha Till
Legal Assistant

Attachment

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 1829

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 TO MOTION FOR STAY**

Expedited Consideration Requested

Pursuant to OAR 860-001-0420, Portland General Electric Company (PGE) submits this Motion for an Extension of Time to file a Response to the Blue Marmot LLCs' (Blue Marmots) Motion for Stay Pending FERC Determination. PGE received the Blue Marmots' Motion for Stay on November 7, 2018. PGE understood the Blue Marmots' Motion for Stay to be a substantive motion, pursuant to OAR 860-001-0390(2)(a), because the Motion invites a ruling regarding the Public Utility Commission of Oregon's (Commission) subject matter jurisdiction. Specifically, the Motion argues that issues central to this case fall within the Federal Energy Regulatory Commission's (FERC) exclusive jurisdiction and that the Commission does not have authority to decide these issues.¹ Therefore, the Blue Marmots assert that FERC is the proper forum to address this case in the first instance and that the Commission proceeding must be stayed.²

¹ Blue Marmots' Motion for Stay at 6, 10.

² Blue Marmots' Motion for Stay at 1, 6.

Viewing the Motion as substantive, PGE understood its Response to be due on November 26, 2018.³ PGE communicated with the Blue Marmots that PGE considered the Motion for Stay to be substantive, and the Blue Marmots did not dispute this characterization. However, PGE received notice today that the Commission may be viewing the Motion for Stay as procedural in nature, in which case PGE's Response deadline would have been November 14, 2018.

Therefore, PGE is filing its Response today, and if the Commission views the Motion for Stay as procedural in nature, PGE respectfully requests an extension of its filing deadline. PGE also requests expedited consideration of this Motion.

Dated this 20th day of November 2018.

McDOWELL RACKNER GIBSON PC



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PORTLAND GENERAL ELECTRIC COMPANY

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³ In this case, the 15-day timeline for filing a response to a substantive motion, OAR 860-001-0420(4), falls on Thanksgiving, and so the response would be due on the next business day, November 26.