



Portland General Electric Company
Legal Department
121 SW Salmon Street • Portland, Oregon 97204
503-464-7181 • Facsimile 503-464-2200

V. Denise Saunders
Associate General Counsel

July 18, 2017

Via Electronic Filing

Oregon Public Utility Commission
Attention: Filing Center
PO Box 1088
Salem OR 97308-1088

Re: UM 1854- PORTLAND GENERAL ELECTRIC COMPANY, Application to Lower the
Standard Price and Standard Contract Eligibility Cap for Solar Qualifying Facilities

Dear Filing Center:

Enclosed for filing in the above-captioned docket is Portland General Electric Company's ("PGE") request for an emergency conference with expedited consideration requested.

This document is being filed by electronic mail with the Filing Center.

Thank you in advance for your assistance.

Sincerely,

A handwritten signature in blue ink that reads "V. Denise Saunders".

V. Denise Saunders
Associate General Counsel

VDS:bop

Enclosure

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 1854

In the Matter of

PORTLAND GENERAL ELECTRIC
COMPANY

Application to Lower the Standard Price and
Standard Contract Eligibility Cap for Solar
Qualifying Facilities.

**Portland General Electric Company's
Request for Emergency Conference**

Expedited Consideration Requested

Portland General Electric Company (“PGE”) respectfully requests an emergency conference by telephone to discuss and resolve a dispute regarding the limited and expedited discovery authorized by the Commission in Chief Administrative Law Judge Michael Grant’s July 13, 2017 prehearing conference memorandum in this proceeding.

Chief Judge Grant’s July 13, 2017 memorandum adopted a schedule for briefing on PGE’s motion for interim relief (responses due July 27, 2017; reply due August 3, 2017) and stated: “To help facilitate **limited** discovery, I shorten turn-around on discovery to 3 business days.”¹ PGE has received extensive, rather than limited, data requests.

On Friday, July 14, 2017, PGE received 26 joint data requests from Intervenors Northwest and Intermountain Power Producers Coalition (“NIPPC”) and Renewable Energy Coalition (“REC”). On Friday, July 14, 2017, PGE received 13 data requests from Intervenor Strata Solar. On Monday, July 17, 2017, PGE received a second set of 39 additional data requests from Intervenors NIPPC and REC. In total, PGE has received 78 data requests. PGE’s response to 39 of those requests is due tomorrow, Wednesday, July 19, 2017. Many of the data requests received by PGE seek detailed information on over 125 QF projects and contracts. Clearly this discovery is not “limited.”

¹ Docket No. UM 1854, Prehearing Conference Memorandum at 2 (Jul. 13, 2017) (emphasis added).

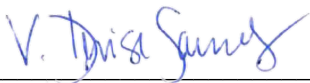
PGE respectfully requests that Chief Judge Grant issue a supplemental ruling further defining the scope of the limited discovery permitted during the initial stage of this proceeding. Specifically, PGE requests the following:

- (1) Limit the number of data requests from one party to any other party to 10 requests.
- (2) Require NIPPC/REC and Strata Solar to identify which 10 data requests from their respective existing requests they want PGE to answer and grant PGE 3 business days to respond once the 10 requests have been identified by each party.
- (3) Clarify that regular discovery will resume once briefing on PGE's motion for interim relief is complete and the Commission has issued an order on the motion.

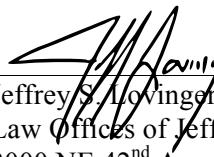
PGE respectfully requests that Judge Grant schedule an emergency conference or grant the requested relief on July 18, 2017 or as soon thereafter as practicable. If an emergency conference is not scheduled for today, July 18, 2017, PGE requests that its obligation to respond to all pending data requests be suspended until an emergency conference can be scheduled. PGE attempted to resolve this issue informally with counsel for Strata Solar and counsel for NIPPC and REC. Counsel for Strata Solar has agreed to PGE's proposal. Counsel for NIPPC and REC does not agree with PGE's proposal.

Dated this 18th day of July 2017.

Respectfully submitted,



V. Denise Saunders, OSB #903769
Associate General Counsel
Portland General Electric Company
121 SW Salmon Street, 1WTC1301
Portland, Oregon 97204
(541) 752-9060 (phone)
(503) 464-2200 (fax)
denise.saunders@pgn.com



Jeffrey S. Lovinger, OSB #960147
Law Offices of Jeffrey S. Lovinger
2000 NE 42nd Avenue, Suite 131
Portland, OR 97213-1397
(503) 230-7120 (office)
(503) 709-9549 (cell)
jeff@lovingerlaw.com