



Portland General Electric Company
Legal Department
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David F. White
Associate General Counsel

June 13, 2018

Via Electronic Filing

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

Re: UM 1854 - PORTLAND GENERAL ELECTRIC COMPANY's 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") Motion to Modify Procedural Schedule, 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 "D. F. White". The signature is stylized, with the first letters of the first and last names being capitalized and prominent.

David F. White
Associate General Counsel

DFW:jm

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 MOTION TO MODIFY
PROCEDURAL SCHEDULE**

Expedited Consideration Requested

Pursuant to OAR 860-001-0420, Portland General Electric Company (“PGE”) respectfully requests modification of the procedural schedule in the above-captioned matter. Specifically, PGE requests that Chief Administrative Law Judge Michael Grant extend all deadlines in the existing schedule by eight weeks such that the first deadline (Staff and Intervenor Response Testimony) would be moved from June 15, 2018, to August 10, 2018.

Stakeholders in this proceeding are making progress toward settlement. The parties are attempting to finalize a settlement so that they can file a settlement proposal with the Public Utility Commission of Oregon (“Commission”) for its consideration and approval consistent with the requirements of OAR 860-001-0350. In order to facilitate these efforts, PGE has requested and obtained four prior extensions of the deadline for Staff and Intervenor to file response testimony.

The stakeholders have a settlement in principle and PGE is hopeful that the stakeholders can finalize and file a settlement stipulation with the Commission on or before June 29, 2018. However, if no settlement stipulation has been filed by June 29, 2018, PGE would expect Parties to proceed with the development of their response testimony in order to be in a position to file that response testimony by August 10, 2018. By requesting an eight week extension of the

deadline for response testimony it is PGE's intention to provide the parties with two and a half weeks to finalize settlement and to provide the parties with six weeks after that to develop and file response testimony if settlement cannot be finalized by June 29, 2018. By setting a deadline for filing a settlement stipulation in conjunction with a deadline for filing response testimony, it is PGE's intent to establish a schedule that will either result in a settlement before the end of June 2018, or provide for this proceeding to move to the next step in an orderly fashion with response testimony due August 10, 2018.

Intervenors Community Renewable Energy Association, Renewable Energy Association, Northwest and Intermountain Power Producers Association, and Renewable Northwest support an indefinite stay of the procedural schedule rather than PGE's proposal for an eight-week modification of the schedule. PGE does not seek or support an indefinite stay of the procedural schedule at this time. PGE is willing to continue to explore settlement but believes there should be an appropriate deadline for moving forward with this matter if settlement cannot be achieved. PGE has already agreed to several extensions of the schedule in this proceeding to accommodate settlement discussions. PGE is hopeful that settlement can be reached, but if it is not then PGE seeks the prompt resolution of this matter in the interest of its customers. As a result, PGE opposes any indefinite suspension of the procedural schedule.

PGE requests expedited consideration of this request to modify the procedural schedule. Under the current schedule, Staff and Intervenors are required to file their response testimony in two days on Friday, June 15, 2018.

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PGE requests that ALJ Grant enter an immediate ruling extending all existing deadlines by eight-weeks such that Staff and Intervenors response testimony would be due August 10, 2018.

DATED this 13th day of June, 2018.

Respectfully submitted,



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