



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

David White
Associate General Counsel

September 18, 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 Motion to Modify
Procedural Schedule**

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 "David White". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

David White
Assistant General Counsel

DW: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 four weeks such that the first deadline (Staff and Intervenor Response Testimony) would be moved from September 21, 2018, to October 19, 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 prior extensions of the deadline for Staff and Intervenors to file response testimony.

The stakeholders have a settlement in principle and are working to execute and file a settlement stipulation with the Commission on or before October 19, 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 a four-week modification of the schedule. PGE does not seek or support an indefinite stay of the procedural schedule at this

time. 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 on Friday, September 21, 2018. PGE requests that ALJ Grant enter an immediate ruling extending all existing deadlines by four-weeks such that Staff and Intervenors response testimony would be due October 12, 2018.

DATED this 18th day of September, 2018.

Respectfully submitted,



David White, OSB #011382
Associate General Counsel
Portland General Electric Company
121 SW Salmon Street, 1WTC1301
Portland, Oregon 97204
(503) 464-7701 (phone)
(503) 464-2200 (fax)
david.white@pgn.com



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