

October 10, 2019

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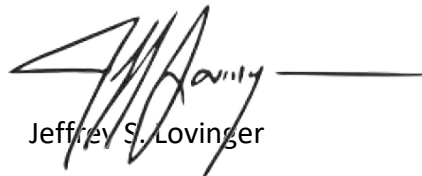
**Re: UM 1971 - Waconda Solar, LLC v. Portland General Electric Company**

Attention Filing Center:

Enclosed for filing today in the above-named docket is a Joint Motion to Extend Time. **Please note that expedited consideration has been requested.**

Thank you for your assistance.

Very truly yours,

  
Jeffrey S. Lovinger

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**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON  
UM 1971**

WACONDA SOLAR, LLC,

Complainant,

vs.

PORTLAND GENERAL ELECTRIC  
COMPANY,

Defendant.

**JOINT MOTION TO EXTEND  
TIME**

*Expedited Consideration Requested*

Pursuant to OAR 860-001-0420, Complainant Waconda Solar, LLC (“Waconda Solar”) and Defendant Portland General Electric Company (“PGE”) jointly move Chief Administrative Law Judge (“ALJ”) Nolan Moser for a ruling that extends the current deadline for Waconda Solar’s Response to PGE’s Motion for Summary Judgment by five weeks from the current due date (*i.e.* moving the deadline from October 16, 2019 to November 20, 2019). The parties have agreed that with this extension of time, the depositions previously noticed by Waconda Solar (and which, by prior agreement, noted by the ALJ in his September 27, 2019 Ruling were moved to October 14, 2019) will be moved by five weeks to November 18, 2019.

The purpose of the requested extension is to accommodate the parties’ decision to engage in further settlement discussions. As with the parties’ joint motions regarding the schedules that were filed on September 11, 2019, and September 26, 2019, the parties wish to maintain their respective positions with regard to data requests or other discovery, even with the requested five-week extension. Thus, the parties propose that the ALJ’s order grant the extension requested above and also approve conditions on future discovery that are intended to preserve that status. The parties thus request an order from the ALJ:

- 1) Approving an extension of the due date of Waconda Solar's Response to PGE's Motion for Summary Judgment to November 20, 2019;
- 2) Acknowledging the parties' agreement to move the previously noticed depositions to November 18, 2019; and
- 3) Limiting discovery during this period of extension, such that: (a) for any depositions noticed by Waconda Solar from October 10, 2019, through November 14, 2019, the required notice period will be extended by 35 days (i.e., the required notice period will be 45 days); and (b) for any data requests or other discovery requests advanced by Waconda Solar from October 10, 2019, through November 14, 2019, PGE's required response date is extended by an additional 35 days.

Waconda Solar and PGE request expedited consideration of this joint motion and a ruling by October 11, 2019, or as soon as practical.

Good cause exists to issue the requested ruling because it will facilitate the parties' efforts to explore a resolution of some or all of the issues in the case and will implement an agreement on scheduling that has been reached by the parties.

Both parties reserve their rights with respect to discovery and the depositions that Waconda Solar has requested (or may request hereafter). Specifically, PGE reserves its right to object to any of the data requests or notices of deposition issued by Waconda Solar and reserves its right to seek a protective order regarding any discovery requests made by Waconda Solar. Similarly, Waconda solar reserves its right to seek information from PGE, consistent with the ALJ's August 3, 2019 ruling, except as limited by this joint motion.

The parties anticipate that if settlement efforts are fruitful, an additional extension of time may be sought from the ALJ through a future motion.

DATED this 10th day of October, 2019.

Respectfully submitted,

PORTLAND GENERAL ELECTRIC  
COMPANY

WACONDA SOLAR LLC

/s/ Jeffrey S. Lovinger

Jeffrey S. Lovinger, OSB #960147  
Markowitz Herbold PC  
1455 SW Broadway, Suite 1900  
Portland, OR 97201  
Telephone: (503) 295-3085  
Fax: (503) 323-9105  
JeffreyLovinger@MarkowitzHerbold.com

/s/ Mark R. Thompson

Mark R. Thompson, OSB #044334  
Sanger Thompson PC  
1041 SE 58th Place  
Portland, Oregon 97215  
Telephone: 503-756-7533  
Fax: 503-334-2235  
mark@sanger-law.com

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