

March 21, 2022

Via Electronic Filing

Public Utility Commission of Oregon
Attn: Filing Center
201 High Street SE, Suite 100
Salem, Oregon 97301-3398

Re: Waconda Solar, LLC v. Portland General Electric Company
PUC Case No. UM 1971

Dear Filing Center:

Enclosed for filing today in the above-named docket is Portland General Electric Company's Unopposed Motion for Stay. **Please note that expedited consideration has been requested.**

Thank you for your assistance.

Very truly yours,



Jeffrey S. Lovinger

Enclosure

1263304

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

WACONDA SOLAR, LLC,

Complainant,

vs.

PORTLAND GENERAL ELECTRIC
COMPANY,

Defendant.

**PORTLAND GENERAL
ELECTRIC COMPANY'S
UNOPPOSED MOTION FOR
STAY**

Expedited Consideration Requested

I. UNOPPOSED MOTION AND REQUEST FOR EXPEDITED CONSIDERATION

Pursuant to OAR 860-082-0420, Portland General Electric Company ("PGE") files this unopposed motion to stay this case until April 20, 2022. The purpose of the stay is to provide the parties with time to focus on a potential settlement of this case. If the parties have not settled the case and moved to dismiss the complaint by April 20, 2022, then the parties would expect to return to litigation with PGE's response to Waconda Solar LLC's ("Waconda Solar") Motion for Partial Summary Judgment ("MPSJ") due one-week later, on April 27, 2022. PGE requests expedited consideration and a ruling on this motion no later than March 22, 2022. PGE and Waconda Solar have conferred by email. Waconda Solar does not oppose this motion or expedited consideration and a ruling by March 22, 2022.

**II. IF THE CASE DOES NOT SETTLE DURING THE STAY PERIOD,
THEN PGE STILL SEEKS A RULING ON ITS
FIRST MOTION OF FEBRUARY 10, 2022**

If the parties are unable to settle this case by April 20, 2022, then PGE will still be seeking a ruling on the first motion it filed on February 10, 2022. That first motion seeks clarification that PGE's response to Waconda's MPSJ will be due (if at all) *after* the Commission rules on PGE's fully-briefed Modified Second Motion for Summary Judgment ("MSJ") and the

Administrative Law Judge (“ALJ”) holds a conference (as called for in the ALJ’s August 4, 2021, Ruling) to address the procedural schedule for any claims remaining unresolved after a decision on PGE’s modified MSJ. This pending first motion from February 10, 2022, is fully briefed. If the parties have not settled this case by April 20, 2022, then PGE seeks a ruling on the first motion (and on PGE’s associated motion for leave to file a reply in support of the first motion) between April 21, 2022, and April 26, 2022. Waconda Solar continues to oppose PGE’s first motion from February 10, 2022.

DATED this 21st day of March, 2022.

Respectfully submitted,

PORTLAND GENERAL ELECTRIC
COMPANY

s/ Jeffrey S. Lovinger

Jeffrey S. Lovinger, OSB #960147

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