

March 7, 2022

Via Electronic Filing

Public Utility Commission of Oregon
Attn: Filing Center
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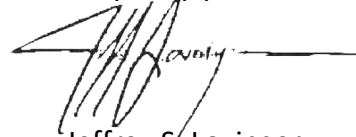
**Re: Waconda Solar, LLC v. Portland General Electric Company
PUC Case No. UM 1971**

Dear Filing Center:

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

Thank you for your assistance.

Very truly yours,


Jeffrey S. Lovinger

Enclosure
1256262

**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 TO
MODIFY RESPONSE DATE**

Expedited Consideration Requested

I. MOTION

Pursuant to OAR 860-082-0420, Portland General Electric Company ("PGE") moves to modify its deadline to respond to Waconda Solar LLC's ("Waconda Solar") Motion for Partial Summary Judgment ("MPSJ"). PGE requests extension of that deadline from March 9, 2022, to March 23, 2022.¹ The purpose of modifying the deadline is to provide the parties with time to focus on a potential settlement of this case. Waconda Solar does not oppose this motion.

II. EXPEDITED CONSIDERATION REQUESTED

PGE requests expedited consideration and approval of this motion by March 8, 2022. An expedited ruling is needed because the deadline to be adjusted is two days away.

III. CONFERRAL

PGE and Waconda Solar have conferred by email. Waconda Solar does not oppose this motion or expedited consideration and a ruling by March 8, 2022.

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¹ PGE notes that it filed two motions on February 10, 2022, and that the first motion has been briefed but not decided. See PGE's Motion to Clarify the Procedural Schedule and to Modify Motion Response Date at 1-2 (Feb. 10, 2022). If PGE's first motion from February 10, 2022, is granted by March 23, 2022, then PGE will not need to respond to Waconda Solar's MPSJ until after the Oregon Public Utility Commission rules on PGE's Modified Second Motion for Summary Judgment.

DATED this 7th day of March, 2022.

Respectfully submitted,

PORTLAND GENERAL ELECTRIC
COMPANY

s/ Jeffrey S. Lovinger

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