

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

Docket No. UM 2009

MADRAS PV1, LLC,

Complainant,

v.

PORTLAND GENERAL ELECTRIC
COMPANY,

Respondent.

COMPLAINANT’S UNOPPOSED MOTION
FOR EXTENSION OF TIME TO: 1) REPLY
TO PGE’S COUNTERCLAIM AND 2)
REPLY TO PGE’S MOTION FOR
APPLICATION OF CONTESTED CASE
PROCEDURES AND FOR DESIGNATION
AS A MAJOR PROCEEDING

Expedited Consideration Requested

I. BACKGROUND

On April 22, 2019, Madras PV 1, LLC (“Madras Solar”) filed a complaint against Portland General Electric Company (“PGE”), along with testimony supporting its complaint, which initiated this proceeding. On June 11, 2019, pursuant to the Administrative Law Judge’s orders approving unopposed extensions of time,¹ PGE filed its Answer to Madras Solar’s complaint, as well as a counterclaim. On that same date, PGE also filed a motion in which PGE seeks to have contested case procedures apply in this case, and also to designate it as a “major proceeding” under OAR 860-001-660.

Under OAR 860-001-660(3)(b), Madras Solar’s response to PGE’s motion would normally be due within 7 days, and under OAR 860-001-0400(4)(e), Madras Solar interprets the OPUC’s rules as providing it a normal deadline of 15 days within which to file its answer, or

¹ See May 2, 2019 Ruling of the Administrative Law Judge, and May 30, 2019 Ruling of the Administrative Law Judge.

reply, to PGE's counterclaim. Madras Solar now files this motion to seek an extension of time in which to file its answer or reply to PGE's counterclaim, as well as its response to PGE's motion to designate the case as a major proceeding and to have contested case procedures apply to it.

II. MOTION

Madras Solar respectfully requests that the Commission enter an order allowing Madras Solar until August 12, 2019 to file its reply to PGE's counterclaim, as well as its response to PGE's motion to designate this case as a major proceeding and to have contested case procedures apply. Madras Solar asks for expedited consideration of this motion, given that its response to PGE's motion for designation of the case as a major proceeding is otherwise due today.

Counsel for Madras Solar has conferred with counsel for PGE, and represents that PGE does not oppose this motion.

III. ARGUMENT

This motion is unopposed. Madras Solar asks that the Commission grant this motion to allow it additional time so that Madras Solar and PGE can review certain documents that are not yet available before determining how to proceed with this case. Upon review of those documents, the parties intend to discuss the case further, and Madras Solar will then file its reply or answer to PGE's counterclaim and its response to PGE's motion, assuming that the case continues.

The Commission should grant this motion because it will facilitate an efficient processing of this case, and allow the parties the time that they have requested to continue to explore the issues in this proceeding.

IV. CONCLUSION

For all of the reasons described above, Madras Solar asks the Commission to provide an extension of time until August 12, 2019 for the filing of its answer or reply to PGE's counterclaim, and its response to PGE's motion to designate the case as a major proceeding and to apply contested case procedures.

Respectfully submitted this 18th day of June, 2019.



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