

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**Docket No. UM 2074**

ZENA SOLAR, LLC,

Complainant,

v.

PORTLAND GENERAL ELECTRIC  
COMPANY,

Defendant.

ZENA SOLAR’S MOTION FOR  
CONFERENCE

Expedited Consideration Requested

**I. MOTION**

Pursuant to OAR 860-001-0420 and OAR 860-001-0590, Zena Solar, LLC (“Zena Solar”), hereby moves the Oregon Public Utility Commission (“OPUC” or the “Commission”) to schedule a conference for this afternoon due to Portland General Electric Company’s (“PGE”) threat to remove Zena Solar from the interconnection queue effective today on account of an interconnection dispute between Zena Solar and PGE.<sup>1</sup> Zena Solar has endeavored to resolve the dispute with PGE, but unfortunately, has not been able to do so. Accordingly, Zena Solar will be filing a Complaint later today, together with a Motion for Interim Relief and Preliminary Injunction. The Motion for

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<sup>1</sup> PGE has stated in correspondence, including as recently as March 26, 2020, that PGE would remove Zena Solar from the interconnection queue effective March 27, 2020 if Zena Solar does not execute an Interconnection Agreement on or before March 27, 2020. Zena Solar has serious concerns about moving forward with the Interconnection Agreement at this time, but nonetheless, has been actively seeking interconnection service with PGE. Zena Solar disagrees with PGE that it can be removed from the queue while actively seeking interconnection service and resolution of the parties’ dispute regarding that service.

Interim Relief and Preliminary Injunction requests that the Commission enjoin PGE from removing Zena Solar from the interconnection queue pending resolution of the dispute. Because of the abbreviated timeline, Zena Solar files this separate Motion for a Conference to discuss PGE's threat to remove Zena Solar from the interconnection queue effective March 27, 2020 prior to resolution of the interconnection dispute. Zena Solar respectfully requests that a conference be scheduled on an expedited basis for this afternoon.

Pursuant to OAR 860-001-0420(6), Zena Solar certifies that it attempted to contact PGE to discuss this motion and state whether PGE supports the motion. PGE opposes expedited consideration.

Dated this 27th day of March 2020.

Respectfully submitted,

Sanger Law, PC



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Irion A. Sanger  
Sanger Law, PC  
1041 SE 58th Place  
Portland, OR 97215  
Telephone: 503-756-7533  
Fax: 503-334-2235  
irion@sanger-law.com

Of Attorneys for Zena Solar