

May 18, 2020

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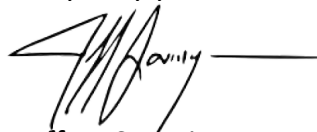
**Re: Zena Solar, LLC v. Portland General Electric Company
PUC Case No. UM 2074**

Attention Filing Center:

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

Thank you for your assistance.

Very truly yours,



Jeffrey S. Lovinger

Enclosure
10000023

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON
UM 2074**

ZENA SOLAR, LLC,

Complainant,

vs.

PORTLAND GENERAL ELECTRIC
COMPANY,

Defendant.

**JOINT MOTION TO MODIFY
PROCEDURAL SCHEDULE**

Expedited Consideration Requested

Pursuant to OAR 860-001-0420, Complainant Zena Solar, LLC (“Zena Solar”) and Defendant Portland General Electric Company (“PGE”) respectfully request that the Public Utility Commission of Oregon (“Commission”) issue an order modifying the procedural schedule in this case by extending procedural deadlines as detailed below. The purpose of this extension is to provide the parties time to discuss settlement.

The requested changes to the schedule are as follows:

Event	Previous Date	Proposed Date
Zena Solar Response to Counterclaim	May 18, 2020	June 1, 2020
Selection of Procedural Path	May 18, 2020	June 1, 2020
PGE Response to Zena Solar Motion for Interim Relief & Preliminary Injunction	May 29, 2020 (to be reviewed by May 18, 2020)	June 12, 2020 (dependent on Procedural Path selected)
Interim Relief Period Deadline	June 30, 2020	July 14, 2020

The “Selection of Procedural Path” event is when the parties decide which procedural path to pursue. The default is Path 1, which involves resolution of Zena Solar’s motion for interim relief and preliminary injunction (“PI Motion”) before resolution of the merits of the case. Path 2 involves the consolidated and expedited resolution of both the merits of the case and the PI Motion. The parties will pursue Path 1 unless they agree in writing by June 1, 2020, to pursue Path 2.

If the procedural schedule proposed above is approved, the parties agree the dates in the procedural paths need to change as follows:

Path 1 – Resolve PI Motion First

Event	Previous Date	New Date
PGE response to PI Motion	May 29, 2020	June 12, 2020
Zena reply re PI Motion	June 5, 2020	June 19, 2020
Parties indicate whether they agree to waive hearing on PI Motion	June 9, 2020	June 23, 2020
Hearing on PI Motion (if not waived)	Week of June 15	Week of June 29
Decision on PI Motion	June 19, 2020	July 8, 2020
Prehearing conference regarding remaining schedule	June 24, 2020	July 15, 2020

Path 2 – Consolidated and Expedited Resolution of Merits an PI Motion

Event	Previous Date	New Date
Temporary interim relief extended to September 4, 2020, deadline to respond to data requests shortened to 7-calendar-days, PGE response to PI Motion to be made as part of simultaneous opening briefing	May 15, 2020	June 1, 2020
Parties to submit stipulated facts	May 21, 2020	June 8, 2020
Simultaneous opening briefs and testimony/declarations	June 8, 2020	June 29, 2020
Simultaneous response briefs and testimony/declarations	July 1, 2020	July 22, 2020
Simultaneous reply briefs	July 15, 2020	August 5, 2020
Parties indicate whether they waive a live hearing	July 17, 2020	August 7, 2020
Hearing, if not waived	Week of July 27	Week of August 17
Decision on the merits and on the PI Motion	August 14, 2020	September 4, 2020

The parties request expedited consideration and a ruling by May 18, 2020.

DATED this 18th day of May 2020.

Respectfully submitted,

PORTLAND GENERAL ELECTRIC
COMPANY

s/ Jeffrey S. Lovinger

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