

July 13, 2020

Via Electronic Filing

Public Utility Commission of Oregon - Filing Center
PO Box 1088
Salem, OR 97308-1088

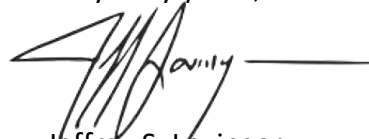
**Re: Zena Solar, LLC v. Portland General Electric Company
PUC Case No. UM 2074**

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
1020063

**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 additional time to discuss settlement.

The requested changes to the schedule are as follows:

Event	Previous Date	Proposed Date
Zena Solar Response to Counterclaim	July 13, 2020	July 27, 2020
Selection of Procedural Path	July 13, 2020	July 27, 2020
PGE Response to Zena Solar Motion for Interim Relief & Preliminary Injunction	July 24, 2020 (dependent on Procedural Path selected)	August 7, 2020 (dependent on Procedural Path selected)
Interim Relief Period Deadline	August 25, 2020	September 8, 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 July 27, 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	July 24, 2020	August 7, 2020
Zena reply re PI Motion	July 31, 2020	August 14, 2020
Parties indicate whether they agree to waive hearing on PI Motion	August 4, 2020	August 18, 2020
Hearing on PI Motion (if not waived)	Week of August 10	Week of August 24
Decision on PI Motion	August 19, 2020	September 2, 2020
Prehearing conference regarding remaining schedule	August 26, 2020	September 9, 2020

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

Event	Previous Date	New Date
Temporary interim relief extended to 10/2/20, 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	July 13, 2020	July 27, 2020
Parties to submit stipulated facts	July 20, 2020	August 3, 2020
Simultaneous opening briefs and testimony/declarations	August 10, 2020	August 24, 2020
Simultaneous response briefs and testimony/declarations	September 2, 2020	September 16, 2020
Simultaneous reply briefs	September 16, 2020	September 30, 2020
Parties indicate whether they waive a live hearing	September 18, 2020	October 2, 2020
Hearing, if not waived	Week of September 28	Week of October 12
Decision on the merits and on the PI Motion	October 16, 2020	October 30, 2020

The parties request expedited consideration and a ruling as soon as possible.

DATED this 13th day of July, 2020.

Respectfully submitted,

PORTLAND GENERAL ELECTRIC
COMPANY

ZENA SOLAR LLC

s/ Jeffrey S. Lovinger

Jeffrey S. Lovinger, OSB #960147
Markowitz Herbold PC
1455 SW Broadway, Suite 1900
Portland, OR 97201
Telephone: (503) 295-3085
JeffreyLovinger@MarkowitzHerbold.com

s/ Irion A. Sanger

Irion A. Sanger, OSB #003750
Sanger Law PC
1041 SE 58th Place
Portland, Oregon 97215
Telephone: 503-756-7533
irion@sanger-law.com