

June 26, 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  
1014499

**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:

<b>Event</b>	<b>Previous Date</b>	<b>Proposed Date</b>
Zena Solar Response to Counterclaim	June 29, 2020	July 13, 2020
Selection of Procedural Path	June 29, 2020	July 13, 2020
PGE Response to Zena Solar Motion for Interim Relief & Preliminary Injunction	July 10, 2020 (dependent on Procedural Path selected)	July 24, 2020 (dependent on Procedural Path selected)
Interim Relief Period Deadline	August 11, 2020	August 25, 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 13, 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 10, 2020	July 24, 2020
Zena reply re PI Motion	July 17, 2020	July 31, 2020
Parties indicate whether they agree to waive hearing on PI Motion	July 21, 2020	August 4, 2020
Hearing on PI Motion (if not waived)	Week of July 27	Week of August 10
Decision on PI Motion	August 5, 2020	August 19, 2020
Prehearing conference regarding remaining schedule	August 12, 2020	August 26, 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	June 29, 2020	July 13, 2020
Parties to submit stipulated facts	July 6, 2020	July 20, 2020
Simultaneous opening briefs and testimony/declarations	July 27, 2020	August 10, 2020
Simultaneous response briefs and testimony/declarations	August 19, 2020	September 2, 2020
Simultaneous reply briefs	September 2, 2020	September 16, 2020
Parties indicate whether they waive a live hearing	September 4, 2020	September 18, 2020
Hearing, if not waived	Week of September 14	Week of September 28
Decision on the merits and on the PI Motion	October 2, 2020	October 16, 2020

The parties request expedited consideration and a ruling by June 29, 2020.

DATED this 26th day of June 2020.

Respectfully submitted,

PORTLAND GENERAL ELECTRIC  
COMPANY

ZENA SOLAR LLC

s/ Jeffrey S. Lovinger

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