

Jeffrey S. Lovinger | Lawyer JeffreyLovinger@MarkowitzHerbold.com

May 4, 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 5. Lovinger

Enclosure

BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

UM 2074

ZENA SOLAR, LLC,

Complainant,

JOINT MOTION TO MODIFY PROCEDURAL SCHEDULE

VS.

Expedited Consideration Requested

PORTLAND GENERAL ELECTRIC COMPANY,

Defendant.

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: (1) extending the date for PGE to file its answer from May 5, 2020, to May 11, 2020; (2) extending the date for Zena Solar to file its response to any counterclaim from May 13, 2020, to May 18, 2020; and (3) extending the date for the parties to select a procedural path from May 15, 2020, to May 18, 2020.

The purpose of these extensions is to provide the parties time to explore a possible settlement. The parties have discussed the extension and agree it is appropriate and will not adversely impact the remaining deadlines in the schedule. If this motion is approved, the procedural schedule in this proceeding would be:

Event	Date
PGE Deadline to Answer Complaint	May 11, 2020
Zena Solar Response to Counterclaims	May 18, 2020
Selection of Procedural Path	May 18, 2020
PGE Response to Zena Solar Motion for	May 29, 2020 (to be reviewed by May 18, 2020)
Interim Relief and Preliminary Injunction	
Interim Relief Period Deadline	June 30, 2020

Zena Solar and PGE are not proposing to modify any other deadlines proposed under Path 1 or Path 2 in the parties' April 17, 2020 Joint Motion to Modify Schedule.

The parties request expedited consideration and a ruling by May 5, 2020.

DATED this 4th day of May 2020.

Respectfully submitted,

PORTLAND GENERAL ELECTRIC COMPANY

ZENA SOLAR LLC

s/ Jeffrey S. Lovinger

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