

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

UM 2090

CUSACK SOLAR, LLC,

Complainant,

vs.

PORTLAND GENERAL ELECTRIC  
COMPANY,

Defendant.

JOINT MOTION TO STAY PROCEEDING

Portland General Electric Company (“PGE”) and Cusack Solar, LLC (“Cusack Solar”) hereby file this Joint Motion to Stay this Proceeding until September 23, 2020. PGE and Cusack Solar are parties to a Settlement Agreement filed as a supplemental filing to Advice No. 20-09, Schedule 136, dated May 14, 2020 (“Settlement Agreement”). PGE and Cusack Solar are also parties to a Public Utility Regulatory Policies Act (“PURPA”) standard power purchase agreement (the “PPA”). The complaint in this docket concerns Cusack Solar’s desire to terminate the PPA and participate in the Community Solar Program (“CSP”). Under the Settlement Agreement, PGE agreed to offer an option to terminate the PPA and that certain surviving provisions (namely section 9.5) of the terminated PPA would not apply to any CSP power purchase agreement, and Cusack Solar agreed to request that this docket be stayed if the Commission approved PGE’s Schedule 136. PGE and Cusack Solar have confirmed that the Commission’s actions at the May 19, 2020 public meeting are sufficient to constitute approval of PGE’s Schedule 136 for the purpose of the Settlement Agreement.

Pursuant to a May 28, 2020 Ruling, this docket has been stayed until August 31, 2020. PGE and Cusack Solar are attempting to resolve issues in connection with implementation of the Settlement Agreement and hereby request that this docket be stayed until September 23, 2020.

DATED this 15<sup>th</sup> day of September, 2020.

Respectfully submitted,

PORTLAND GENERAL ELECTRIC COMPANY

/s/ David F. White

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CUSACK SOLAR, LLC

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