

# ESLER, STEPHENS & BUCKLEY

ATTORNEYS AT LAW

700 PIONEER TOWER  
888 SW FIFTH AVENUE

PORTLAND, OREGON 97204-2021

GARY N. HARDIMAN  
SENIOR LEGAL ASSISTANT

MICHAEL J. ESLER  
JOHN W. STEPHENS  
KIM T. BUCKLEY\*

\*ADMITTED IN OREGON AND WASHINGTON

FACSIMILE (503) 294-3995  
TELEPHONE (503) 223-1510

JOHN W. STEPHENS  
Email: [STEPHENS@ESLERSTEPHENS.COM](mailto:STEPHENS@ESLERSTEPHENS.COM)  
DIRECT DIAL: (503) 935-5393

December 17, 2009

Via Electronic and First Class Mail

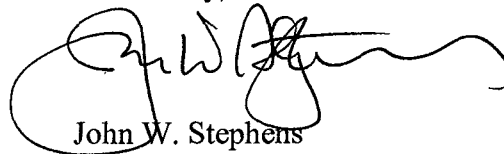
Filing Center  
Public Utility Commission  
P.O. Box 2148  
Salem, Oregon 97308-2148

Re: In the Matter of Public Utility Commission of Oregon, Investigation into Pilot Programs to demonstrate the use and effectiveness of Volumetric Incentive Rates for Solar Photovoltaic Energy Systems, PUC Docket No. UM 1452

Dear Filing Center:

Enclosed please find an original and one copy of Renewable Northwest Project's Unopposed Motion to Extend Time to File Opening Comments.

Yours truly,



John W. Stephens

JWS/mec  
cc: Service List  
Enclosures

K:\Maureen\RNP\UM 1452\PUC 2 ltr.doc

BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON

UM 1452

**In the Matter of** )  
 )  
**PUBLIC UTILITY COMMISSION OF** ) **RENEWABLE NORTHWEST PROJECT'S**  
**OREGON** ) **UNOPPOSED MOTION TO EXTEND**  
 ) **TIME TO FILE OPENING COMMENTS**  
 )  
**Investigation into Pilot Programs to** )  
**demonstrate the use and effectiveness of** )  
**Volumetric Incentive Rates for Solar** )  
**Photovoltaic Energy Systems.** )

Intervenor Renewable Northwest Project ("RNP") moves for an order extending by 4 days, from December 18, 2009, to December 22, 2009, the time for the parties to file their Opening Comments to PUC Staff's Straw Proposal.

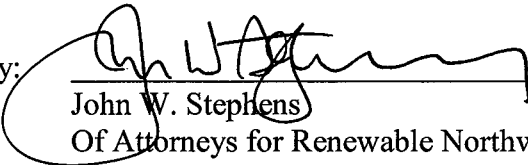
RNP and the other parties have been diligently working on the Opening Comments, but RNP found it needed an additional 4 days to complete the Opening Comments and to coordinate with RNP's coalition partners. Other parties agreed.

RNP has conferred with the other parties, and no one has objected to this short extension of time. RNP has specifically heard from PUC Staff, CUB, PacifiCorp, Oregon AFL-CIO, EFN, OREP, and EMO.

For the foregoing reasons, RNP respectfully requests that the motion be allowed.

DATED this 17<sup>th</sup> day of December, 2009.

ESLER, STEPHENS & BUCKLEY

By:   
\_\_\_\_\_  
John W. Stephens  
Of Attorneys for Renewable Northwest  
Project

**CERTIFICATE OF SERVICE**

I hereby certify that I served the foregoing **RENEWABLE NORTHWEST PROJECT'S UNOPPOSED MOTION TO EXTEND TIME TO FILE OPENING COMMENTS** on the following persons on December 17, 2009, by hand-delivering, faxing, e-mailing, or mailing (as indicated below) to each a copy thereof, and if mailed, contained in a sealed envelope, with postage paid, addressed to said attorneys at the last known address of each shown below and deposited in the post office on said day at Portland, Oregon:

Gordon Feighner  
[gordon@oregoncub.org](mailto:gordon@oregoncub.org)  
Citizen's Utility Board of Oregon  
610 S.W. Broadway, Suite 308  
Portland, Oregon 97205

by hand-delivery  
 by facsimile  
 by first class mail  
 by e-mail

Bob Jenks  
[bob@oregoncub.org](mailto:bob@oregoncub.org)  
Citizens' Utility Board of Oregon  
610 S.W. Broadway, Suite 308  
Portland, Oregon 97205

by hand-delivery  
 by facsimile  
 by first class mail  
 by e-mail

G. Catriona McCracken  
[catriona@oregoncub.org](mailto:catriona@oregoncub.org)  
Citizen's Utility Board of Oregon  
610 S.W. Broadway, Suite 308  
Portland, Oregon 97205

by hand-delivery  
 by facsimile  
 by first class mail  
 by e-mail

Irion A. Sanger, Esq.  
[ias@dvclaw.com](mailto:ias@dvclaw.com)  
Davison Van Cleve, P.C.  
333 S.W. Taylor, Suite 400  
Portland, Oregon 97204

by hand-delivery  
 by facsimile  
 by first class mail  
 by e-mail

Melinda J. Davison  
[mjd@dvclaw.com](mailto:mjd@dvclaw.com)  
Davison Van Cleve, P.C.  
333 S.W. Taylor, Suite 400  
Portland, Oregon 97204

by hand-delivery  
 by facsimile  
 by first class mail  
 by e-mail

Stephanie S. Andrus  
[stephanie.andrus@state.or.us](mailto:stephanie.andrus@state.or.us)  
Department of Justice  
1162 Court Street N.E.  
Salem, Oregon 97301-4096

by hand-delivery  
 by facsimile  
 by first class mail  
 by e-mail

Doug Kuns  
[pge.opuc.filings@pgn.com](mailto:pge.opuc.filings@pgn.com)  
Portland General Electric Company  
121 S.W. Salmon Street, 1WTC0702  
Portland, Oregon 97204

- by hand-delivery
- by facsimile
- by first class mail
- by e-mail

J. Richard George, Esq.  
[richard.george@pgn.com](mailto:richard.george@pgn.com)  
Assistant General Counsel  
Portland General Electric Company  
121 S.W. Salmon, 1WTC1301  
Portland, Oregon 97204

- by hand-delivery
- by facsimile
- by first class mail
- by e-mail

Theresa Gibney  
[theresa.gibney@state.or.us](mailto:theresa.gibney@state.or.us)  
Public Utility Commission of Oregon  
P.O. Box 2148  
Salem, Oregon 97308-2148

- by hand-delivery
- by facsimile
- by first class mail
- by e-mail

Ann English Gravatt  
[ann@rnp.org](mailto:ann@rnp.org)  
Suzanne Liou  
[suzanne@rnp.org](mailto:suzanne@rnp.org)  
Renewable Northwest Project  
917 S.W. Oak, Suite 303  
Portland, Oregon 97205

- by hand-delivery
- by facsimile
- by first class mail
- by e-mail

Teddy Keizer  
[teddy@goteddygo.com](mailto:teddy@goteddygo.com)  
1615 S.E. 30th Avenue  
Portland, Oregon 97214

- by hand-delivery
- by facsimile
- by first class mail
- by e-mail

Raymond S. Kindley  
[rkindley@cablehuston.com](mailto:rkindley@cablehuston.com)  
Cable Huston et al.  
1001 S.W. Fifth Avenue, Suite 2000  
Portland, Oregon 97204-1136

- by hand-delivery
- by facsimile
- by first class mail
- by e-mail

Ben Nelson  
[nrocnelson@qwest.net](mailto:nrocnelson@qwest.net)  
10245 S.E. Holgate Boulevard  
Portland, Oregon 97266

- by hand-delivery
- by facsimile
- by first class mail
- by e-mail

Jenny Holmes  
[jholmes@emoregon.org](mailto:jholmes@emoregon.org)  
Ecumenical Ministries of Oregon  
0245 S.W. Bancroft, Suite B  
Portland, Oregon 97239

- by hand-delivery
- by facsimile
- by first class mail
- by e-mail

Kathleen Newman  
[knewman@emoregon.org](mailto:knewman@emoregon.org)  
Oregon Interfaith Power & Light  
Ecumenical Ministries of Oregon  
1553 N.E. Greensword Drive  
Hillsboro, Oregon 97214

- by hand-delivery
- by facsimile
- by first class mail
- by e-mail

Kacia Brockman  
[kacia@energytrust.org](mailto:kacia@energytrust.org)  
Energy Trust of Oregon  
851 S.W. Sixth Avenue, Suite 1200  
Portland, Oregon 97204

- by hand-delivery
- by facsimile
- by first class mail
- by e-mail

John M. Volkman, Esq.  
[john.volkman@energytrust.org](mailto:john.volkman@energytrust.org)  
Energy Trust of Oregon, Inc.  
851 S.W. Sixth Avenue, Suite 1200  
Portland, Oregon 97204

- by hand-delivery
- by facsimile
- by first class mail
- by e-mail

Jennifer Gleason  
[jen@elaw.org](mailto:jen@elaw.org)  
Environmental Law Alliance Worldwide  
1877 Garden Avenue  
Eugene, Oregon 97403

- by hand-delivery
- by facsimile
- by first class mail
- by e-mail

Randy Allphin  
[rallphin@idahopower.com](mailto:rallphin@idahopower.com)  
Idaho Power Company  
PO Box 70  
Boise, Idaho 83707-0070

- by hand-delivery
- by facsimile
- by first class mail
- by e-mail

Christa Bearry  
[cbearry@idahopower.com](mailto:cbearry@idahopower.com)  
Idaho Power Company  
PO Box 70  
Boise, Idaho 83707-0070

- by hand-delivery
- by facsimile
- by first class mail
- by e-mail

Karl Bokenkamp  
[kbokenkamp@idahopower.com](mailto:kbokenkamp@idahopower.com)  
General Manager-Power Supply Planning  
Idaho Power Company  
PO Box 70  
Boise, Idaho 83707-0070

- by hand-delivery
- by facsimile
- by first class mail
- by e-mail

Ric Gale  
[rgale@idahopower.com](mailto:rgale@idahopower.com)  
VP - Regulatory Affairs  
Idaho Power Company  
PO Box 70  
Boise, Idaho 83707-0070

- by hand-delivery
- by facsimile
- by first class mail
- by e-mail

Barton L. Kline, Esq.  
[bkline@idahopower.com](mailto:bkline@idahopower.com)  
Idaho Power Company  
PO Box 70  
Boise, Idaho 83707-0070

- by hand-delivery
- by facsimile
- by first class mail
- by e-mail

Jeff Malmen  
[jmalmen@idahopower.com](mailto:jmalmen@idahopower.com)  
Idaho Power Company  
PO Box 70  
Boise, Idaho 83707-0070

- by hand-delivery
- by facsimile
- by first class mail
- by e-mail

Lisa D. Nordstrom, Esq.  
[lnordstrom@idahopower.com](mailto:lnordstrom@idahopower.com)  
Idaho Power Company  
PO Box 70  
Boise, Idaho 83707-0070

- by hand-delivery
- by facsimile
- by first class mail
- by e-mail

Gregory W. Said  
[gsaid@idahopower.com](mailto:gsaid@idahopower.com)  
Director, Revenue Requirement  
Idaho Power Company  
PO Box 70  
Boise, Idaho 83707-0070

- by hand-delivery
- by facsimile
- by first class mail
- by e-mail

Mark Stokes  
[mstokes@idahopower.com](mailto:mstokes@idahopower.com)  
Manager, Power Supply & Planning  
Idaho Power Company  
PO Box 70  
Boise, Idaho 83707-0070

- by hand-delivery
- by facsimile
- by first class mail
- by e-mail

Michael Youngblood  
[myoungblood@idahopower.com](mailto:myoungblood@idahopower.com)  
Senior Pricing Analyst  
Idaho Power Company  
PO Box 70  
Boise, Idaho 83707-0070

- by hand-delivery
- by facsimile
- by first class mail
- by e-mail

Wendy McIndoo  
[wendy@mcd-law.com](mailto:wendy@mcd-law.com)  
Office Manager  
McDowell & Rackner, P.C.  
520 S.W. Sixth Avenue, Suite 830  
Portland, Oregon 97204

- by hand-delivery
- by facsimile
- by first class mail
- by e-mail

Lisa F. Rackner, Esq.  
[lisa@mcd-law.com](mailto:lisa@mcd-law.com)  
McDowell & Rackner, P.C.  
520 S.W. Sixth Avenue, Suite 830  
Portland, Oregon 97204

- by hand-delivery
- by facsimile
- by first class mail
- by e-mail

Warren Fish  
[warren.fish@co.multnomah.or.us](mailto:warren.fish@co.multnomah.or.us)  
Multnomah County  
501 S.E. Hawthorne, Suite 600  
Portland, Oregon 97214

- by hand-delivery
- by facsimile
- by first class mail
- by e-mail

Jeff Cogen  
[district2@co.multnomah.or.us](mailto:district2@co.multnomah.or.us)  
Commissioner, Multnomah County  
501 S.E. Hawthorne, Suite 600  
Portland, Oregon 97214

- by hand-delivery
- by facsimile
- by first class mail
- by e-mail

Oregon AFL-CIO  
[afl-cio@oraflcio.org](mailto:afl-cio@oraflcio.org)  
[duke@oraflcio.org](mailto:duke@oraflcio.org)  
2110 State Street  
Salem, Oregon 97214

- by hand-delivery
- by facsimile
- by first class mail
- by e-mail

John S. Bishop II, Esq.  
[jbishop@mbjlaw.com](mailto:jbishop@mbjlaw.com)  
McKanna Bishop Joffe & Sullivan, LLP  
1635 N.W. Johnson  
Portland, Oregon 97209

- by hand-delivery
- by facsimile
- by first class mail
- by e-mail

Judy Barnes  
[jbarnes@hevanet.com](mailto:jbarnes@hevanet.com)  
Oregonians for Renewable Energy Payments  
1425 S.E. 37th  
Portland, Oregon 97214

- by hand-delivery
- by facsimile
- by first class mail
- by e-mail

Mark Pete Pengilly  
[mpengilly@gmail.com](mailto:mpengilly@gmail.com)  
Oregonians for Renewable Energy Payments  
PO Box 10221  
Portland, Oregon 97296

- by hand-delivery
- by facsimile
- by first class mail
- by e-mail

Ryan Flynn, Esq.  
[ryan.flynn@pacificorp.com](mailto:ryan.flynn@pacificorp.com)  
PacifiCorp  
825 N.E. Multnomah, Suite 1800  
Portland, Oregon 97232

- by hand-delivery
- by facsimile
- by first class mail
- by e-mail

PacifiCorp  
[oregondockets@pacificorp.com](mailto:oregondockets@pacificorp.com)  
825 N.E. Multnomah, Suite 2000  
Portland, Oregon 97232-2153

- by hand-delivery
- by facsimile
- by first class mail
- by e-mail

Andrew Koyaanisqatsi  
[andrew@solarenergyoregon.com](mailto:andrew@solarenergyoregon.com)  
Solar Energy Solutions, Inc.  
3730 S.E. Lafayette Court  
Portland, Oregon 97202

- by hand-delivery
- by facsimile
- by first class mail
- by e-mail

Tim O'Neil  
[tim@southeastuplift.org](mailto:tim@southeastuplift.org)  
Southeast Uplift Neighborhood Coalition  
3534 S.E. Main Street  
Portland, Oregon 97212

- by hand-delivery
- by facsimile
- by first class mail
- by e-mail

Joe Henri  
[jhenri@sunedison.com](mailto:jhenri@sunedison.com)  
SunEdison  
12500 Baltimore Avenue  
Beltsville, Maryland 20705

- by hand-delivery
- by facsimile
- by first class mail
- by e-mail

Steven McGrath  
[steve@solutions21st.com](mailto:steve@solutions21st.com)  
Sustainable Solutions Unlimited, LLC  
1339 S.E. 8th Avenue, #B  
Portland, Oregon 97214

- by hand-delivery
- by facsimile
- by first class mail
- by e-mail



Daniel Weldon  
[danweldon@umpquabank.com](mailto:danweldon@umpquabank.com)  
Umpqua Bank  
19790 South Ferguson Terrace  
Oregon City, Oregon 97045

- by hand-delivery
- by facsimile
- by first class mail
- by e-mail

Raymond P. Neff  
[rpneff@efn.org](mailto:rpneff@efn.org)  
461-1/2 River Road  
Eugene, Oregon 97404

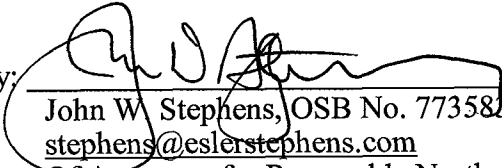
- by hand-delivery
- by facsimile
- by first class mail
- by e-mail

Melody Guy  
Oregon District Council of Laborers  
[melodyg@qwestoffice.net](mailto:melodyg@qwestoffice.net)

- by hand-delivery
- by facsimile
- by first class mail
- by e-mail

DATED this 17<sup>th</sup> day of December, 2009.

ESLER STEPHENS & BUCKLEY

By:   
John W. Stephens, OSB No. 773588  
[stephens@eslerstephens.com](mailto:stephens@eslerstephens.com)  
Of Attorneys for Renewable Northwest Project