

McDowell Rackner & Gibson PC



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November 19, 2015

VIA ELECTRONIC

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

**Re: UM 1725 – In the Matter of IDAHO POWER COMPANY Application to Lower
Standard Contract Eligibility Cap and to Reduce the Standard Contract Term**

Attention Filing Center:

Attached for filing in the above-referenced docket is an electronic copy of Joint Motion for Extension of Time to file Response, Expedited Consideration Requested.

Please contact this office with any questions.

Very truly yours,

A handwritten signature in blue ink that reads "Wendy McIndoo".

Wendy McIndoo
Office Manager

Attachment

BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON

UM 1725

In the Matter of
IDAHO POWER COMPANY

**JOINT MOTION FOR EXTENSION OF
TIME TO FILE RESPONSE**

Application to Lower Standard Contract
Eligibility Cap and to Reduce the
Standard Contract Term, for Approval of
Solar Integration Charge, and for Change
in Resource Sufficiency Determination.

**EXPEDITED CONSIDERATION
REQUESTED**

1 In accordance with OAR 860-001-0420(1), Idaho Power Company (Idaho Power or
2 Company) and Staff of the Public Utility Commission of Oregon (Staff) submit this motion
3 requesting that the deadline for filing responses to Obsidian Renewables, LLC's
4 (Obsidian) Motion to Hold Proceeding in Abeyance (Motion to Abate) be extended to
5 November 30, 2015. Staff and Idaho Power request expedited consideration of this
6 motion because the current due date for responses to the Motion to Abate is tomorrow,
7 November 20, 2015. Staff intends to seek a similar extension in docket UM 1734.

8 As required by OAR 860-001-0420(2) and (6), Idaho Power has contacted the
9 parties regarding this request and no party has indicated that they object. Obsidian does
10 not object to the Motion, but Obsidian is also willing and able to adhere to the original
11 schedule.

12 Obsidian filed its Motion to Abate on November 13, 2015. Due to the stage of this
13 proceeding, on November 16, 2015, Chief Administrative Law Judge Michael Grant issued
14 a Ruling establishing an expedited schedule for responding to the Motion to Abate.
15 Pursuant to that expedited schedule, responses to the Motion to Abate are currently due
16 on November 20, 2015, and Obsidian's reply is due November 25, 2015. Staff and Idaho

1 Power request that these dates be extended so that responses will be due November 30,
2 2015, and Obsidian's reply will be due December 7, 2015. These filing dates conform to
3 the timeline provided by OAR 860-001-0420(4) for responses and replies to substantive
4 motions.

5 Granting this motion will not prejudice any party or compromise the remaining
6 schedule in this case. The only remaining event in this docket is the simultaneous filing of
7 post-hearing briefs, which will occur on December 10, 2015. The schedule proposed in
8 this motion will allow parties to fully respond to the Motion to Abate prior to filing post-
9 hearing briefs and will allow the Commission to fully consider the Motion to Abate prior to
10 issuing a decision in this case.

11

12 Respectfully submitted this 19th day of November, 2015.

MCDOWELL RACKNER & GIBSON PC



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IDAHO POWER COMPANY

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