

1 **BEFORE THE PUBLIC UTILITY COMMISSION**
2 **OF OREGON**
3 **UM 1910, 1911, 1912**

4 In the Matters of
5 PACIFICORP, dba PACIFIC POWER, Re-
6 source Value of Solar (UM 1910)
7 IDAHO POWER COMPANY Resource
8 Value of Solar (UM 1911)
9 and
10 PORTLAND GENERAL ELECTRIC
11 COMPANY, Resource Value of Solar
12 (UM 1912).

**STAFF MOTION TO MODIFY PROCEDURAL
SCHEDULE**

**EXPEDITED CONSIDERATION RE-
QUESTED**

12 Staff of the Public Utility Commission of Oregon (“Staff”) moves the Administrative
13 Law Judge (ALJ) to issue an order modifying the procedural schedules in the above-captioned
14 dockets. Staff requires additional time to draft and prepare testimony in these matters because
15 the Project Manager of these dockets resigned on January 24, 2018, and the new Project Manag-
16 er and other Staff assigned require additional time to complete the Staff’s review of the utilities’
17 filings and to draft testimony. Counsel for Staff has contacted all parties to these dockets regard-
18 ing this motion and none object to the motion or Staff’s request for expedited consideration. To
19 facilitate expedited consideration, Staff asks that responses to this motion be due no later than
20 noon on Tuesday, February, 13, 2018.

21 To accommodate an extension to the opening testimony, the other dates in the schedule
22 will have to be delayed as well. Several parties have conflicts March through May 2018 that
23 Staff proposes to accommodate in order to obtain a schedule that will work for all parties.

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1 Staff's proposed modifications to the schedules in Docket Nos. UM 1910, 1911, and
 2 1912 are as follows:

Event	Current	Proposed	
Staff/Intervenor Opening Testimony	February 16, 2018	March 16, 2018	
Commissioner Workshop	March 1	Week of April 2-6, 2018	
Utilities Reply/All-Party Reply	March 16, 2018	April 20, 2018	
All-parties Cross-Exam Statements	March 30, 2018	May 7, 2018	
Hearing on RVOS Filings	April 9, 2018	Week of May 21, 2018	
Utilities' Opening Briefs	May 4, 2018	N/A	
Staff/Intervenor Response Briefs	May 18, 2018	All Parties' Opening Briefs	June 11, 2018
Utilities' Closing Briefs	June 1, 2018	All Parties' Closing Briefs	July 2, 2018
Target Date for Decision	July 2018	September 1, 2018	

18 PacifiCorp's witnesses are not available for cross-examination between April 10 and May
 19 14, 2018. Staff proposes a hearing date the week of May 21, 2018, to accommodate their wit-
 20 nesses. Renewable NW's witness is unavailable for a Commission workshop between March 9
 21 and March 23. Accordingly, Staff recommends moving the Commission workshop to the first
 22 week of April in order to accommodate his schedule and also the schedules of any participants
 23 who may have plans over Oregon's spring break, which is the week of March 26-30, 2018.

1 In addition to modifying the due dates for the briefs, Staff proposes to eliminate the open-
2 ing brief for the utilities and substitute the current briefing schedule with simultaneous opening
3 and closing briefs, thereby giving Staff and intervenors the opportunity to respond to each oth-
4 er's briefs. The above-captioned dockets allow opportunity for all parties to suggest refinements
5 to the methodology adopted by the Commission. Accordingly, the schedule for testimony con-
6 templates that Staff and intervenors will have opportunity to respond to each other's testimony.
7 However, the briefing schedule would not allow Staff opportunity to respond to intervenors'
8 briefs and vice-versa.

9 Staff would like opportunity to respond to intervenor's briefs regarding the methodology
10 and believes it is appropriate for intervenors to have the same opportunity. Accordingly, Staff
11 asks that Staff and intervenors be allowed to file a final brief in which they respond to each other
12 at the same time the utilities file briefs responding to Staff and intervenors.

13 Staff's request for additional time to prepare opening testimony results in a schedule with
14 a target date in early September 2018 rather than July 2018. Staff has been unable to find an al-
15 ternate schedule that is workable for all parties and ends in July. Notably, it is only PacifiCorp's
16 witnesses that have a conflict between April 10 and May 14, 2018, which means a more com-
17 pressed schedule would be possible for Portland General Electric Co. (PGE) and Idaho Power
18 Company. However, Staff believes it is efficient and more informative if the hearings for the
19 three utilities are kept on the same day. Accordingly, Staff does not ask the Commission to sepa-
20 rate the schedules in order to expedite the processing of two of the three dockets.

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1 **CONCLUSION**

2 Staff asks the ALJ to process this motion to modify the procedural schedule on an expedited basis and make the due date for responses no later than noon on February 13, 2017. Staff
3 also asks that the ALJ issue an order adopting the schedule proposed above.
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5 DATED this 12th day of February 2018.
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7 Respectfully submitted,

8 **ELLEN F. ROSENBLUM**
9 Attorney General

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11 Stephanie S. Andrus, #92512
12 Senior Assistant Attorney General
13 Of Attorneys for Staff of the Public Utility
14 Commission of Oregon
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