

IN THE COURT OF APPEALS OF THE STATE OF OREGON

In the Matter of
PACIFICORP, dba Pacific Power,
Applicant-Respondent,
and
OREGON PUBLIC UTILITY
COMMISSION,
Respondent,
v.

RENEWABLE ENERGY
COALITION, NORTHWEST AND
INTERMOUNTIAN POWER
PRODUCERS COALITION,
OREGON SOLAR ENERGY
INDUSTRIES ASSOCIATION and
COMMUNITY RENEWABLE
ENERGY ASSOCIATION,
Petitioners,
and
NEWSUN ENERGY, LLC,
Intervenor Below.

Agency No. UM 2108

Appellate Court No. A175363

MOTION - LEAVE TO FILE AMENDED
REPLY MEMORANDUM

The Public Utility Commission moves for leave to file an amended reply memorandum in this matter. Opposing counsel has no objection to this motion.

The reply memorandum correctly states that the Staff Report on Order No. 21-268 states that Dalreed Solar did not have an executed contract with PacifiCorp. The Staff Report is incorrect; PacifiCorp and Dalreed have both executed a Interconnection Feasibility Study Agreement. This error was

graciously pointed out by opposing counsel. That argument is removed from the corrected reply.

It is so moved.

Respectfully submitted,

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Attorney General
BENJAMIN GUTMAN #160599
Solicitor General

/s/ Denise G. Fjordbeck

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Attorneys for Respondent
Public Utility Commission

NOTICE OF FILING AND PROOF OF SERVICE

I certify that on April 2, 2021, I directed the original Motion – Leave to File Amended Reply Memorandum to be electronically filed with the Appellate Court Administrator, Appellate Records Section, and electronically served upon Irion A. Sanger, attorney for petitioners; Gregory M. Adams, attorney for petitioner; Anna Marie Joyce and Dallas Steven DeLuca, attorneys for respondent; using the court's electronic filing system.

I further certify that on April 2, 2021, I directed the Motion – Leave to File Amended Reply Memorandum to be served upon Karen Kruse and Adam Lowney, attorneys for respondent, and Joni Sliger, attorney for petitioners, by mailing a copy, with postage prepaid, in an envelope addressed to:

Karen Kruse
PacifiCorp
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Portland, OR 97232

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