

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 &
INTERMOUNTAIN POWER
PRODUCERS COALITION,
COMMUNITY RENEWABLE
ENERGY ASSOCIATION and
OREGON SOLAR ENERGY
INDUSTRIES ASSOCIATION,
Petitioners,

And

NEWSUN ENERGY, LLC,
Intervenor below.

CA No. A175363

Public Utility Commission of Oregon
Docket No. UM 2108

**PETITIONERS' MOTION – FILE
REPLY**

Petitioners Renewable Energy Coalition, Northwest & Intermountain Power
Producers Coalition, Community Renewable Energy Association, and Oregon
Solar Energy Industries Association respectfully move for leave to submit a reply

to PacifiCorp's response to the petition for reconsideration. The proposed reply is filed concurrently with this motion per ORAP 7.10(4).

The petition for reconsideration was filed on July 13, 2021. PacifiCorp filed its response on July 26, 2021. The Public Utility Commission ("PUC") did not file a response.

Petitioners' proposed reply is intended to clarify an apparent factual misunderstanding of PacifiCorp regarding Dalreed Solar, LLC's relationship with petitioner organizations and to ensure the arguments presented are not misunderstood by the Court. There is good cause for the reply to ensure the Court understands the arguments and facts asserted by the petition for reconsideration. Additionally, the reply should not materially delay the Court's consideration of the petition for reconsideration because the reply is filed within seven days of PacifiCorp's response.

Counsel for the PUC has communicated that the PUC does not oppose this motion for leave to reply, and counsel for PacifiCorp has communicated PacifiCorp takes no position on this motion for leave to reply.

For the reasons stated above, Petitioners respectfully request that this Court grant leave to file a reply in support of the petition for reconsideration.

Dated this 3rd day of August 2021.

Respectfully submitted,

SANGER LAW, PC

s/ Irion Sanger

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Attorney for Petitioner Community
Renewable Energy Association

CERTIFICATE OF SERVICE

I certify that I served a copy of the foregoing **Petitioners' Motion – File Reply** on all of the following:

Dallas DeLuca, OSB #072992	Denise Fjordbeck, OSB #822578
Anna Joyce, OSB #013112	Oregon Department of Justice
Markowitz Herbold PC	Business Activities Section
1455 SW Broadway, Suite 1900	1162 Court St. NE
Portland, OR 97201-3412	Salem, OR 97301-4096

By

- Mailing, by placing the copy in a postage prepaid sealed envelope addressed to the attorney's or other person's last known address as shown above and deposited with the U.S. Postal Service at Portland, OR by registered or certified mail.
- Commercial Delivery Service
- Facsimile
- Hand Delivery
- E-mail
- Electronic Service via the Appellate Courts' eFiling system at the email address as recorded on the date of service in the appellate eFiling system.

I further certify that I served a copy of the foregoing **Petitioners' Motion – File Reply** on all of the following:

Karen Kruse, OSB #112733	Oregon Public Utility Commission
825 NE Multnomah Ste 2000	Stephanie S. Andrus, OSB #925123
Portland OR 97232	Oregon Department of Justice
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- Mailing, by placing the copy in a postage prepaid sealed envelope addressed to the attorney's or other person's last known address as shown above and deposited with the U.S. Postal Service at Portland, OR by registered or certified mail.
- Commercial Delivery Service
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DATED this 3rd day of August 2021.

s/ Gregory Adams
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CERTIFICATE OF FILING

I certify that I filed the foregoing **Petitioners' Motion – File Reply** with the Appellate Court Administrator via the Oregon Appellate Court eFiling system.

DATED this 3rd day of August 2021.

s/ Gregory Adams

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