



CHEYENNE AGUILERA  
Direct (503) 290-3627  
cheyenne@mrg-law.com

September 15, 2020

**VIA ELECTRONIC FILING**

Attention: Filing Center  
Public Utility Commission of Oregon  
201 High Street SE, Suite 100  
P.O. Box 1088  
Salem, Oregon 97308-1088

**Re: Docket UM 2108 – PacifiCorp's Application for an Order Approving Queue Reform Proposal**

Attention Filing Center:

Attached for filing in the above-captioned docket is Pacificorp's Response to Request for Expedited Consideration of Application for Rehearing and Reconsideration.

Please contact this office with any questions.

Sincerely,

Cheyenne Aguilera  
Office Manager

Attachment

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**UM 2108**

In the Matter of

PACIFICORP, dba PACIFIC POWER,

Application for an Order Approving Queue  
Reform Proposal.

**PACIFICORP’S RESPONSE TO  
REQUEST FOR EXPEDITED  
CONSIDERATION OF APPLICATION  
FOR REHEARING AND  
RECONSIDERATION**

1           PacifiCorp, dba Pacific Power submits this response to the request for expedited  
2 consideration of Dalreed Solar, LLC’s (Dalreed Solar) Application for Rehearing and  
3 Reconsideration of Order No. 20-268 and/or Request for Waiver of PacifiCorp’s Queue Reform  
4 Proposal (Application) filed with the Public Utility Commission of Oregon (Commission) on  
5 September 15, 2020.

6           Dalreed Solar requests extraordinary relief from the Commission’s recently approved  
7 process for reforming and streamlining PacifiCorp’s interconnection study process. PacifiCorp  
8 will respond to the merits of Dalreed Solar’s request in a subsequent response. Here, PacifiCorp  
9 responds only to Dalreed Solar’s request for expedited consideration of the Application.

10           PacifiCorp does not generally object to expedited resolution of the Application given the  
11 impending deadlines imposed by both PacifiCorp’s Open Access Transmission Tariff (OATT) and  
12 Order No. 20-268 for commencing the transitional cluster study process. But PacifiCorp does  
13 object to Dalreed Solar’s request for expedited consideration to the extent it would shorten the  
14 time for PacifiCorp to respond. OAR 860-001-0720(4) allows PacifiCorp 15 days to file a

1 response to the Application, which would make PacifiCorp’s response due September 29, 2020.  
2 Dalreed has neither requested a change to that due date nor provided any basis to require  
3 PacifiCorp to file a response before September 29. Moreover, there is no basis for limiting  
4 PacifiCorp’s ability to respond to Dalreed Solar’s Application.

5 First, a shorter time to respond will prejudice PacifiCorp. PacifiCorp requires the full 15  
6 days provided by OAR 860-001-0720(4) to ensure that the record is sufficiently developed before  
7 the Commission considers the merits of Dalreed Solar’s Application.

8 Second, to the extent that allowing PacifiCorp 15 days to respond prejudices Dalreed Solar,  
9 that is a result of Dalreed Solar’s decision to file its Application on September 14, 2020. The  
10 Commission approved PacifiCorp’s interconnection queue reform proposal at its public meeting  
11 on August 12, 2020. Dalreed Solar waited over a month before filing the Application. Dalreed  
12 Solar’s delay should not prejudice PacifiCorp’s ability to respond.


13 Third, there is no provision in either OAR 860-001-0720(4) or ORS 756.561 that authorizes  
14 the Commission provide expedited consideration of the Application—particularly when doing so  
15 would shorten the time for PacifiCorp’s response. To the extent the Commission applies the  
16 standard for expedited consideration of motions found in OAR 860-001-0420(6), Dalreed did not  
17 comply with the requirements of that rule. Specifically, Dalreed Solar neither conferred with  
18 PacifiCorp as required by OAR 860-001-0420(6)(a) nor included a request to shorten the time for  
19 responses as required by OAR 860-001-0420(c).

20 For the foregoing reasons, PacifiCorp requests that the Administrative Law Judge (ALJ)  
21 affirm that PacifiCorp’s response to the Application is due September 29, 2020.

22 // // // //

1

Respectfully submitted this 15<sup>th</sup> day of September, 2020.

By:   
Adam Lowney  
McDowell Rackner Gibson PC  
419 SW 11th Avenue, Suite 400  
Portland, OR 97205  
Phone: 503-595-3926  
Email: adam@mrg-law.com

Karen Kruse  
PacifiCorp  
825 NE Multnomah Street, Suite 1800  
Portland, OR 97232  
Phone: 503-813-5585  
Email: karen.kruse@pacificorp.com

Attorneys for PacifiCorp d/b/a Pacific Power