



The Commission's Order No. 34976 established a 14-day period with a due date of May 18, 2021, for filing of reply comments in response to Staff's comments. Fall River intends to file reply comments.

However, despite diligent efforts in this matter, Fall River expects to require an additional week to ensure its comments adequately address the issues raised in Staff's comments and provide a complete record for the Commission's consideration of such issues. One of the issues in particular raised by Staff – the correct vintage of avoided cost rates applicable to the PPA – implicates complicated issues of law and fact related to the negotiations of the PPA. Fall River initially requested the PPA for the Chester Diversion Project in September 2019, and there are numerous communications and materials to review and potentially present in response to the issue raised by Staff regarding the vintage of rates that should apply. Additionally, despite efforts to do so, counsel for Fall River has been unable to yet discuss the matters related to any of Staff's proposed changes to the PPA with PacifiCorp to ascertain its position on Staff's proposals, which may impact the position taken by Fall River. Thus, to adequately address the issues presented by Staff's comments, Fall River respectfully requests an additional week. No party will be prejudiced by the extension, and the interests of justice support such extension.

Consistent with Rule 256.02(b), counsel for Fall River contacted counsel for Staff and PacifiCorp regarding this request for expedited relief. PacifiCorp stated it does not oppose the extension so long as the extension also applies to the due date for PacifiCorp's reply comments. Staff stated it takes no position. The facts set forth above establish good cause for issuing the requested procedural relief on an expedited basis.

For the reasons set forth above, Fall River respectfully requests a seven-day extension to the due date for reply comments in this proceeding, which would make reply comments due on May 25, 2021.

DATED: May 13, 2021.

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## CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 13th day of May, 2021, I delivered true and correct copies of the foregoing Motion for Extension of Time to the following parties via electronic mail:

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Dated: May 13, 2021

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