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(Additional counsel of record listed on
signature page)

**UNITED STATES DISTRICT COURT
DISTRICT OF MONTANA
BILLINGS DIVISION**

PORTLAND GENERAL ELECTRIC
COMPANY; AVISTA
CORPORATION; PACIFICORP; and
PUGET SOUND ENERGY, INC.,

Plaintiffs,

v.

NORTHWESTERN CORPORATION;
TALEN MONTANA, LLC; AUSTIN
KNUDSEN, in his official capacity as
Attorney General for the State of
Montana,

Case No. 1:21-cv-00047-SPW-KLD

MOTION TO CONSOLIDATE OF
THE PACIFIC NORTHWEST
OWNERS PLAINTIFFS

Defendants.	
TALEN MONTANA, LLC,	
Plaintiff,	
v.	
AVISTA CORPORATION; NORTHWESTERN CORPORATION; PACIFICORP; PORTLAND GENERAL ELECTRIC COMPANY; and PUGET SOUND ENERGY, INC.,	
Defendants.	

Case No. 1:21-cv-00058-SPW-TJC

(removed from Montana Thirteenth
Judicial District Court, Yellowstone
County, Cause No. DV-21-0511)

MOTION TO CONSOLIDATE
OF THE PACIFIC NORTHWEST OWNERS

Pursuant to Rule 42(a) of the Federal Rules of Civil Procedure, Avista Corporation, PacifiCorp, Portland General Electric Company, and Puget Sound Energy, Inc. (“Pacific Northwest Owners”) move this Court to consolidate *Talen Montana, LLC v. Avista Corporation, et al.*, Case No. 1:21-cv-00058-SPW-TJC (“*Talen*”)¹ with *Portland General Electric Company, et al. v. NorthWestern Corporation, et al.*, Case No. 1:21-cv-00047-SPW-KLD (“*Portland General*

¹ *Talen* was originally filed in Montana Thirteenth Judicial Court Yellowstone County on May 4, 2021. Talen filed its first amended complaint on May 5, 2021. This case was removed to the United States District Court for the District of Montana, Billings Division, on May 17, 2021.

Electric”) and continue the consolidated case under *Portland General Electric*.²
Portland General Electric is the first-filed action.

This motion to consolidate is supported by the memorandum in support of motion to consolidate that is being submitted concurrently with this motion.

L.R. 7.1(c)(1) compliance statement

The Pacific Northwest Owners have consulted with the other parties to these proceedings regarding this motion. The Pacific Northwest Owners understand that NorthWestern Corporation does not oppose, Austin Knudsen, in his official capacity as Attorney General for the State of Montana, does not take a position, and Talen Montana opposes the motion to consolidate the above-captioned proceedings.

Dated this 3rd day of June, 2021.

HANSBERRY & JOURDONNAIS, PLLC

/s/ Charles E. Hansberry

Charles E. Hansberry
Jenny M. Jourdonnais

*Attorneys for Portland General Electric
Company, Avista Corporation, PacifiCorp,
and Puget Sound Energy, Inc.*

² *Portland General Electric* was originally filed in the United States District Court for the District of Montana, Billings Division, on May 4, 2021. The Pacific Northwest Owners filed an amended complaint on May 19, 2021.

CERTIFICATE OF SERVICE

I hereby certify that on June 3, 2021, a copy of the foregoing document was served on the following persons:

Via ECF:

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6.	<p>Via Email Only (by consent):</p>

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