

KENNETH KAUFMANN ATTORNEY AT LAW

1785 Willamette Falls Drive • Suite 5
West Linn, OR 97068

office (503) 230-7715
fax (503) 972-2921

Kenneth E. Kaufmann
ken@kaufmann.law

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VIA ELECTRONIC MAIL (PUC.FilingCenter@state.or.us)

Commission Chair Lisa Hardie
Commissioner Steven Bloom
Commissioner Meghan Decker
Oregon Public Utility Commission
201 High St SE, Suite 100
Salem, Oregon 97301

Subject: Docket No. UM 1728--Application to Update Schedule 201 Qualifying Facility Information

Dear Commissioners,

Last year I spoke to the Commission regarding PGE's April 29 Schedule 201 update filing. You may recall PGE asked the Commission to move forward the effective date proposed in its original filing, from June 22 to June 8. Staff recommended and the Commission ordered a June 22 effective date. In rejecting PGE's request to accelerate, I recall Commissioner Bloom citing the importance of regularity in deadlines as a driver in his decision to vote for a longer approval window. Allowing rates to be filed and become effective in 17 days in 2017, compared to 55 days in 2016, is not regular.

The second issue with the short review period is whether it is adequate for review. After work papers for the proposed filing and the previous filing are provided, approximately 32 separate worksheets in PGE's work papers require comparison to the previous filing. Where changes occur, they must be interpreted. Data requests or additional research may be warranted. With three IOUs this effort is multiplied, and amounts to a large amount of work just to confirm that the filings are accurate and complete. 17 days is a very short time to accomplish this. If we assume 1 day to provide working papers and 6 days for Staff to incorporate comments into its analysis, that leaves only 10 calendar days for parties to complete their review of the rate filing. This is unreasonably short.

Some may assert that the short review period is needed to protect the ratepayers. This argument has surface logic, however it feels very different to a developer that has expended hundreds of thousands of dollars to develop a project and is thwarted by a surprise rate change. This short effective period was without precedent, unexpected, and PGE did not inform QFs with whom it was negotiating of its intent. If the Commission desires to address and emergent condition, rather than regularly update rates, perhaps it would be more fair to grandfather those that were invested and likely to reach a LEO before the expected rate change date?

Finally, as to whether there is an excessive or overpriced amount of QF development, I hope that the Commission will perform its own assessment. Renewable QFs and QFs under 20MW satisfy a portion of the Oregon Renewable Portfolio Standards (RPS) that larger projects do not. They may

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cost more than a very large, utility owned, resource, but the legislature has deemed these other benefits important as articulated in the RPS, and the Commission's adoption of standard renewable avoided cost rates in furtherance of this goal is squarely within the Commission's proper legal authority under PURPA.

A 45-60 day delay from the filing, timed to coincide with the last public meeting in the 60-day window, best balances the policy concerns mentioned above.

Thank you for your consideration.

A handwritten signature in black ink, appearing to read "Ken Kaufmann", with a long horizontal line extending to the right.

Ken Kaufmann

Attorney for small renewable energy project developers