

April 4, 2018

Commission Chair Lisa Hardie
Commissioner Stephen Bloom
Commissioner Megan Decker
Public Utility Commission of Oregon
PO Box 1088
Salem, OR 97308-1088

Re: Docket No. AR 614 New Facility Direct Access Load - Public Utilities Commission of Oregon Order Number 18-031

Dear Commissioners:

Albertsons Companies is one of the largest food and drug retailers in the United States, with both a strong local presence and national scale. The company operates stores, manufacturing plants and distribution centers across 35 states and the District of Columbia under 19 well-known banners including Albertsons, Safeway, Vons, Jewel-Osco, Shaw's, Acme, Tom Thumb, Randalls, United Supermarkets, Pavilions, Star Market, Haggen and Carrs.

- In Oregon, we employ approximately 15,993 people, most represented by United Food and Commercial Workers (UFCW), who support 144 stores, 129 pharmacies, 34 gasoline stations, and a 990,000 square-foot of distribution and manufacturing space. Our Portland Division headquarters is located in 16300 SE Evelyn Street, Clackamas, OR 97015.
- Last year we contributed over \$760,000 in charitable donations to Oregon non-profit organizations, and over 8.8M lbs. of food to the Oregon Food Bank.

As you know, the Commission's stated Mission (amongst other goals) is to ensure utility customers have access to just and reasonable rates. AR 614 is a laudable effort in this regard. AR 614 addresses: (1) the situation where a new business locates to Oregon or an existing business expands their operations and desires to participate in the direct access program of either PGE or PacifiCorp and (2) what, if any, transition adjustment charges apply in those instances.

Working together to be the *favorite local supermarket*™

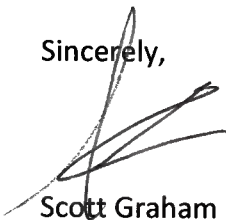
Albertsons Companies is writing you today because of concerns that the Commission is considering adopting a customer eligibility threshold that sets the new facility minimum usage at a level that would, in all practical effects, restrict access to the program for only very large single meter site loads and not accommodate large aggregated load. This outcome would thwart the intentions of Senate Bill 1149 and unfairly treat and discriminate against almost all the other business customers, such as Albertsons Companies, that are the backbone of Oregon's economy and are actively expanding our businesses and hiring new employees.

Albertsons Companies urges you to adopt a minimum customer load threshold for new facility direct access load that provides for a *meaningful* opportunity for businesses, like Albertsons Companies, to participate and implement the benefits called for in SB 1149. For example, a minimum facility load of 200KW with an aggregated load in the State of 2MW would allow participation by many of the businesses that are critical to the State's economy. It would also provide consideration for those businesses (such as ours) that in good faith have pursued energy efficiency as encouraged by the Energy Trust of Oregon over past decades.

Albertsons Companies is a strong supporter of competitive power markets. We currently participate in the competitive direct access market behind Portland General Electric (PGE).

Albertsons Companies urges your support of a participation threshold that is inclusive to a greater group of Oregon's business customers who help ensure the economic success and vitality of the state.

Sincerely,



Scott Graham
Vice President - National Programs
Albertsons Companies, Inc.

cc: Lance Kaufmann, Oregon Public Utility Commission Staff
(lance.kaufman@state.or.us)