



4/11/2018

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

Re: AR 614 New Facility Direct Access Load

Dear Commissioners:

QTS Realty Trust, Inc. (NYSE: QTS) is a leading provider of data center solutions across a diverse footprint spanning more than 6 million square feet of owned mega scale data center space throughout North America. Through its software-defined technology platform, QTS is able to deliver secure, compliant infrastructure solutions, robust connectivity and premium customer service to more than 1,100 leading hyperscale technology companies, enterprises, and government entities.

QTS owns property in Hillsboro, OR, and has plans in place to develop the site into a data center campus.

As regulatory policy makers 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 is addressing the situation of when 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 what, if any, transition adjustment charges apply.

QTS is writing you today because we are concerned that you may adopt 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 the very largest customers. This outcome would thwart the intentions of Senate Bill 1149 and would be discriminatory to almost all the other business customers, such as QTS, that are the backbone of Oregon's economy and are actively expanding our businesses and hiring new employees.



QTS urges you to adopt a minimum customer load threshold for new facility direct access load that provides for a *meaningful* opportunity for businesses, like QTS, to participate and enjoy the benefits envisioned in SB 1149.

Sincerely,

A handwritten signature in blue ink that reads "T. Wright". The signature is written in a cursive, flowing style.

Travis Wright
Vice President – Energy and Sustainability

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