

May 15, 2020

VIA ELECTRONIC FILING

Public Utility Commission of Oregon
Attn: Filing Center
201 High Street SE, Suite 100
Salem, OR 97301-3398

Re: Docket AR 617—Final Comments on Draft Rules

The Public Utility Commission of Oregon (Commission) Staff distributed draft revisions to the Commission's rules regarding Renewable Portfolio Standards (RPS), specifically OAR § 860-083-300 related to compliance standards on April 30, 2020. Pursuant to Staff's request for feedback, PacifiCorp d/b/a Pacific Power (PacifiCorp) respectfully provides the following suggested edits.


Section 860-083-300(4):

For purposes of this rule, ~~t~~The electric company's multi-state allocation of ~~unbundled~~ renewable energy certificates shall be informed by the most recent inter-jurisdictional allocation protocol adopted by the Commission ~~for purposes of compliance with the applicable Oregon renewable portfolio standard.~~

The proposed edits clarify that the company's multi-state allocation should be applicable to all renewable energy certificates, not just unbundled RECs. Finally, PacifiCorp suggests deleting the language at the end of this section and inserting "For purposes of this rule" at the beginning of the draft section. This is consistent with the language in proposed section (3)(b)(A).

Please contact Cathie Allen, Regulatory Affairs Manager, at (503) 813-5934 if you have any questions.

Sincerely,



Michael Wilding
Director, Regulation
Pacific Power & Light Company