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Via Electronic Filing

Chair Hardie
Commissioner Bloom
Commissioner Decker
Public Utility Commission of Oregon
201 High St. SE, Suite 100
Salem OR 97301

Re: In the Matter of OREGON PUBLIC UTILITY COMMISSION STAFF Request
to Revise the Scope of AR 610 and Open Two Additional Renewable Portfolio
Standard Rulemaking Dockets
April 10, 2018 Public Meeting, Agenda Item RM1

Dear Commissioners:

The Alliance of Western Energy Consumers (“AWEC”), f/k/a the Industrial Customers of Northwest Utilities, respectfully submits these comments on the above-referenced agenda item for the April 10, 2018 Regular Public Meeting. In the Oregon Public Utility Commission Staff’s memo on this issue, it recommends that the Commission open two additional rulemaking dockets to review the Commission’s current rules governing the renewable portfolio standard (“RPS”), and adopt a staggered schedule for each docket. Under Staff’s proposal, the current RPS rulemaking would become three rulemakings, one to address incremental cost of compliance, one to address RPS planning and reporting, and one to address issues associated with renewable energy credits.

AWEC does not oppose Staff’s proposed segregation of these issues or its schedule for the initial scoping workshops for each issue. However, AWEC would like to better understand Staff’s rationale for splitting this process into three separate rulemakings. AWEC is unaware of any reason why the issues Staff proposes to address cannot be evaluated on separate procedural tracks, but within the same rulemaking. The rules at issue here are all within the same division of OAR 860 (Division 83) and, consequently, it would seem to make sense to evaluate amendments to them within the same rulemaking. Undoubtedly, the issues Staff proposes to address in separate rulemakings are interrelated and stakeholders’ discussions on one of these issues will likely impact the others. Additionally, addressing these issues in separate dockets will likely impose incremental administrative burdens on the Commission and stakeholders. The

Commission, for instance, will need to make three filings with the Secretary of State instead of one. For its part, AWEC prepares intervenor funding reports to the Commission for matching fund grants that may be slightly more complicated by having to track additional dockets. AWEC does not suggest here that such burdens are insurmountable. However, Staff's memo does not appear to provide a rationale for its recommendation to open additional rulemakings. If the burdens of Staff's recommendation would likely outweigh any potential benefits, then AWEC recommends that stakeholders continue to address all RPS-related rulemaking issues within AR 610.

Finally, as noted above, AWEC does not object to Staff's proposed dates for scoping workshops on each issue it identifies in its memo. However, AWEC considers this to be a critical rulemaking and wishes to express its position that the rulemaking proceed as expeditiously as possible.

Sincerely,

/s/ Tyler C. Pepple

Tyler C. Pepple