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## *Via Electronic Filing*

Public Utility Commission of Oregon  
Attn: Filing Center  
201 High St. SE, Suite 100  
Salem OR 97301

Re: In the Matter of OREGON PUBLIC UTILITY COMMISSION  
Rulemaking Related to Renewable Portfolio Standard Planning Process and  
Reports.  
**Docket No. AR 616**

Dear Filing Center:

Pursuant to the Oregon Public Utility Commission (“Commission”) Staff’s May 15, 2020 request for comments regarding Staff’s straw proposal for changes to the process and contents of both Renewable Portfolio Implementation Plans (“RPIP”) and Renewable Portfolio (“RPS”) Compliance Reports, the Alliance of Western Energy Consumers (“AWEC”) provides the following responses to Staff’s straw proposal.

AWEC appreciates the opportunity to provide comments and generally supports Staff’s straw proposal. Specifically, regarding timing, AWEC supports Staff’s proposal that “[t]he utility should file their RPIP as a companion filing to the IRP or IRP update.”<sup>1/</sup> This requirement supports uniformity between the two documents and will likely streamline the administrative processes involved.

Additionally, AWEC supports more clearly identifying assumptions throughout the RPIP, “specifically those used in calculating incremental cost,” as well as requiring that there be “no difference between RPIP and IRP assumptions and data.”<sup>2/</sup> Such a requirement will decrease the possibility of discrepancies between the two documents and support consistency among utilities. Further, AWEC supports including “[a] forecast of the costs of using 20% unbundled renewable energy certificates for compliance” as an additional reporting element for

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<sup>1/</sup> Docket No. AR 616, Straw Proposal for RPS Rulemaking Dockets, at 2 (May 15, 2020).

<sup>2/</sup> Id.

the utility.<sup>3/</sup> Although it is unclear at this time what Staff intends by the additional reporting element requiring that “[f]orecasting Scenario and sensitivity requirements should be updated to reflect Oregon’s renewable energy and climate change priorities,”<sup>4/</sup> AWEC looks forward to discussing it further with Staff and stakeholders at the June 19, 2020 webinar.

Sincerely,

/s/ Corinne O. Milinovich

Corinne O. Milinovich

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<sup>3/</sup> Id. at 3.

<sup>4/</sup> Id. at 2.