

October 7, 2016

Via Email

Chair Lisa Hardie  
Commissioner John Savage  
Commissioner Steve Bloom  
Oregon Public Utility Commission  
201 High St SE, Suite 100  
Salem, Oregon 97301

RE: In the Matter of Cypress Creek Renewables, LLC, Petition for Declaratory Ruling  
Docket No. DR 51

Dear Commissioners:

The Northwest and Intermountain Power Producers Coalition (“NIPPC”) submits these comments supporting Cypress Creek Renewables, LLC’s (“Cypress Creek’s”) request that the Oregon Public Utility Commission (the “Commission”) issue a declaratory ruling confirming that renewable qualifying facilities (“QFs”) selling their output and renewable energy certificates (“RECs”) to Oregon utilities will be offered renewable prices.

NIPPC is a membership-based advocacy group representing electricity market participants in the Pacific Northwest. NIPPC’s members include independent power producers, electricity service suppliers, and transmission companies. NIPPC’s focus is on the advancement of fair, competitive electric markets.

PacifiCorp’s position that large renewable QFs are not eligible for renewable avoided cost prices will harm ratepayers by unnecessarily limiting options for independent power producers to sell renewable power to Oregon utilities. Because larger QFs can assist PacifiCorp in meeting Oregon’s increased renewable portfolio standard requirements, these QFs should likewise be offered renewable avoided cost pricing from PacifiCorp.

PacifiCorp is attempting to limit competition and increase the Company’s own ability to ensure that renewable energy is generated from facilities owned by utilities rather than independent power producers. Protecting utilities from the forces of competition will necessarily drive up the power costs that are ultimately paid by ratepayers.

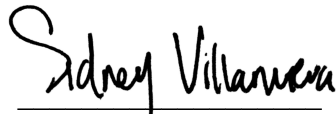
PacifiCorp’s refusal to pay renewable avoided costs prices for renewable power also runs counter to the Commission’s policy providing QFs the option of choosing

NIPPC Comments  
Large QF Renewable Avoided Cost Rates  
Docket No. DR 51  
October 7, 2016  
Page 2 of 2

between the renewable resource QF rate and the standard QF rate.<sup>1</sup> The Commission has never limited the availability of renewable QF prices to QFs under the Commission's size threshold.

The Commission should remedy the harm to Cypress Creek, other larger QFs, the competitive market, and ultimately ratepayers by ensuring that all renewable QFs will be offered renewable avoided cost prices when selling eligible power and RECs to PacifiCorp. Any other result will provide yet another opportunity for PacifiCorp to increase its monopsony power to the detriment of the market and end use consumers.

Sincerely,

  
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Sidney Villanueva

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<sup>1</sup> Re Commission Investigation Into Resource Sufficiency Pursuant to Order No. 06-538, Docket No. UM 1396 (Phase II), Order No. 11-505 at 5 (Dec. 13, 2011).