



May 16, 2016

Oregon Public Utility Commission
201 High Street SE, #100
Salem, OR 97301

Dear Commissioners and Staff:

As non-profits working to support a clean energy transition in Oregon, Climate Solutions and Oregon Environmental Council have been actively engaged and supportive of the development and now implementation of SB 1547. The broad intent of SB 1547 is to ensure Oregon's rapid and steady transition to a clean energy economy consistent with achieving our state's legislated greenhouse gas reduction goals (HB 3543).

A renewable portfolio standard (RPS) of 50% and the elimination of coal-fired electricity service to Oregon by 2030 create new opportunities for clean, renewable energy. SB 1547 also provides time-limited near-term incentives for new renewable generating facilities in the form of non-expiring renewable energy certificates (RECs). Combined with the recent extension of federal tax credits for wind and solar, and rising renewable energy requirements in neighboring states, there are now exceptional opportunities to develop renewable energy generation in the region.

For these reasons, we strongly encourage PacifiCorp and Portland General Electric to move toward early compliance with SB 1547. We view the timing of the proposal of the Renewable RFP by PacifiCorp as consistent with early action and the time-limited incentives provided by extension of the federal tax credits.

Climate Solutions and Oregon Environmental Council value competition in renewable energy markets and support third-party as well as utility owned options for compliance with SB 1547, provided those options achieve the OPUC criteria of least-cost and least-risk for consumers. We appreciate PacifiCorp's willingness to pull stakeholders together to provide greater transparency into their RFP process and clarify that the intent of their RFPs is not to limit ownership opportunities and competition. We support efforts by the OPUC to ensure that procurement is truly open to different ownership models for ratepayer benefit, provided that the added process does not result in offtake agreements occurring later than this Fall in light of the availability of the federal production tax credit.

Given the urgency of transitioning our energy system from fossil fuels to renewables, and the unique near-term opportunities to acquire resources, we encourage the PUC facilitate a process that ensures ratepayer benefit and results in transactions that capture the full PTC this year while benefitting from the early compliance provisions with SB 1547.

Sincerely,

Kristen Sheeran, Oregon Director
Climate Solutions

Andrea Durbin, Executive Director
Oregon Environmental Council