



May 15, 2017

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

**Re: Investigation into the Treatment of New Facility Direct Access Loads**

Dear Commissioners:

The Northwest & Intermountain Power Producers Coalition (NIPPC) respectfully requests the Oregon Public Utility Commission (OPUC or the Commission) adopt staff's recommendation and open an investigation into enabling facilities moving to or expanding in Oregon to bypass paying the transition (exit) fees now required under Oregon's direct access policy.

Senate Bill 979, as originally drafted, would have encouraged businesses seeking to leave utility cost of service for direct access to do so provided they exclusively powered their enterprises with renewable energy. The final version of the legislation as considered by the Oregon Senate Business and Transportation Committee on April 3<sup>rd</sup> exempted *new* loads from the obligation to pay exit fees. Committee Chair Senator Lee Beyer declined to move the bill choosing instead to request the OPUC to consider lifting transition charges for new loads.

NIPPC sees this investigation as a small but important step in breathing new life into direct access. The Coalition's "ask" at this time for that the Commission conduct a focused and expedited investigation to establish how new loads may avoid paying to "leave" utility service that they have never used.

Electricity policy underpins Oregon's economic and environmental health. Multiple business and trade organizations have emphasized the importance of lowering businesses' power costs and carbon emissions. These corporate goals can be achieved without effecting remaining ratepayers.

While recognizing the OPUC's already congested agenda, NIPPC sincerely hopes the Commission will concur with its staff and open an investigation into adjusting direct access in response to businesses' interest in tapping cost effective renewable energy for their use above and beyond existing Renewable Portfolio Standard requirements.

Sincerely,

Robert D. Kahn, Executive Director