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Via Electronic Filing

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

Re: OREGON PUBLIC UTILITY COMMISSION STAFF Request for Investigation
into the Treatment of New Facility Direct Access Loads
May 16, 2017 Public Meeting Item No. 4

Dear Commissioners:

The Industrial Customers of Northwest Utilities (“ICNU”) files these comments to seek clarification of the Oregon Public Utility Commission (“Commission”) Staff’s recommendation in the above-referenced matter. Staff recommends that the Commission “investigate questions related to the appropriate treatment of direct access transition adjustments for new commercial customer load at a new site.” Based on the totality of the Staff memorandum, ICNU assumes Staff intends the investigation to apply to any new direct access load; however, its specific reference to new “commercial” load raises questions about the scope of the investigation.

ICNU notes that Senate Bill 979, referenced in Staff’s memo, would have applied to any new direct access load, not just a “commercial” load, even though the bill does specifically reference commercial loads.^{1/} ICNU is not aware of any reason to restrict the investigation to commercial loads (although if such a reason does exist it should be determined following an investigation of the type requested by Staff here, rather than presumed). ICNU, therefore, requests that the Staff recommendation be modified to specifically state that the investigation will apply to “new loads eligible for direct access,” i.e., any non-residential customer load. With that clarification, ICNU supports Staff’s recommendation in this matter.

Sincerely,

/s/ Tyler C. Pepple
Tyler C. Pepple

^{1/} SB 979 § 1(22).