BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

UM 1805

| NORTHWEST AND INTERMOUNTAIN |) |
|-----------------------------|--------------------------|
| POWER PRODUCERS COALITION, |) |
| COMMUNITY RENEWABLE ENERGY |) NORTHWEST AND |
| ASSOCIATION and RENEWABLE |) INTERMOUNTAIN POWER |
| ENERGY COALITION, |) PRODUCERS COALITION, |
| |) COMMUNITY RENEWABLE |
| Complainants, |) ENERGY ASSOCIATION and |
| |) RENEWABLE ENERGY |
| V. |) COALITION'S MOTION FOR |
| | OFFICIAL NOTICE |
| PORTLAND GENERAL ELECTRIC |) |
| COMPANY, | |
| |) |
| Defendant. |) |
| |) |

I. INTRODUCTION

Pursuant to ORS 860-001-0420(1) and 860-001-0460(1), the Northwest and Intermountain Power Producers Coalition ("NIPPC"), Community Renewable Energy Association ("CREA"), and Renewable Energy Coalition ("Coalition") (collectively "Complainants") respectfully request that Oregon Public Utility Commission ("Commission") Administrative Law Judge ("ALJ") Allan Arlow take official notice of the several Commission documents related to Portland General Electric's ("PGE's") interpretation of the Commission's policy requires 15 years of fixed prices from the time of power deliveries, including PGE's standard contracts implementing that policy.

II. MOTION

The Commission is considering whether its policy requiring 15 years of fixed price payments begins when power deliveries (and sales) begin or upon contract

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execution. The Commission's 15-year fixed-price policy is discussed in UM 1129, UM

1610, UM 1734, and UM 1725, including:

- Re Investigation Related to Electric Utility Purchases from Qualifying Facilities, Docket No. UM 1129, Staff Testimony (Aug. 3, 2004).
- Re Investigation Related to Electric Utility Purchases from Qualifying Facilities, Docket No. UM 1129, PacifiCorp Brief (Dec. 22, 2004).
- Re Investigation Related to Electric Utility Purchases from Qualifying Facilities, Docket No. UM 1129, PGE Brief (Dec. 23, 2004).
- Re Investigation Related to Electric Utility Purchases from Qualifying Facilities, Docket No. UM 1129, Staff Brief (Dec. 23, 2004).
- Re Investigation Relating to Electric Utility Purchases from Qualifying Facilities, Docket No. UM 1129, PGE Reply Brief (Jan. 28, 2005).
- See Re Investigation Relating to Electric Utility Purchases from Qualifying Facilities, Docket No. UM 1129, Oral Arguments Transcript (Feb. 7, 2005)
- Re Investigation Relating to Electric Utility Purchases from Qualifying Facilities, Docket No. UM 1129, Order No. 05-584 (May 13, 2005).
- Re Investigation Related to Electric Utility Purchases From Qualifying Facilities, Docket No. UM 1129, PGE's Compliance Filing (July 12, 2005).
- Re Investigation Related to Electric Utility Purchases From Qualifying Facilities, Docket No. UM 1129, Idaho Power's Compliance Filing (July 12, 2005).
- Re Investigation Related to Electric Utility Purchases from Qualifying Facilities, Docket No. UM 1129, PacifiCorp's Compliance Filing (July 12, 2005).
- Re Investigation Related to Electric Utility Purchases from Qualifying Facilities Docket No. UM 1129, Order No. 05-899 (Aug. 9, 2005).
- Re Investigation Related to Electric Utility Purchases from Qualifying Facilities, Docket No. UM 1129, Corrected Ruling (Nov. 29, 2005).
- Re Investigation Related to Electric Utility Purchases from Qualifying Facilities Docket No. UM 1129, Idaho Power's Compliance Filing (Nov. 3, 2006).
- Re Investigation Related to Electric Utility Purchases From Qualifying Facilities, Docket No. UM 1129, PGE's Compliance Filing (Jan. 23, 2007).
- Re Investigation Related to Electric Utility Purchases from Qualifying Facilities, Docket No. UM 1129, Order No. 07-360 (Aug. 20, 2007).
- Re Investigation into Qualifying Facility Contracting and Pricing, Docket No. UM 1610, Staff's Proposed Issues List (Oct. 3, 2012).
- Re Investigation into Qualifying Facility Contracting and Pricing, Docket No. UM 1610, PGE Direct Testimony (Feb. 4, 2013).
- Re Investigation into Qualifying Facility Contracting and Pricing, Docket No. UM 1610, PacifiCorp Direct Testimony (Feb. 4, 2013).
- Re Investigation Into Qualifying Facility Contracting and Pricing, Docket No. UM 1610, Staff Response Testimony (Mar. 18, 2013).
- Re Investigation into Qualifying Facility Contracting and Pricing, Docket No. UM 1610, Renewable Northwest Project Response Testimony (Mar. 18, 2013).
- Re Investigation into Qualifying Facility Contracting and Pricing, Docket No. UM

- 1610, OneEnergy Response Testimony (Mar. 18, 2013).
- Re Investigation into Qualifying Facility Contracting and Pricing, Docket No. UM 1610, PGE Direct Testimony (Apr. 29, 2013).
- Re Investigation Into Qualifying Facility Contracting and Pricing, Docket No. UM 1610, Reply Testimony of Bruce W. Griswold (Apr. 29, 2013).
- <u>Re Investigation Into Qualifying Facility Contracting and Pricing</u>, Docket No. UM 1610, ODOE Post-Hearing Brief (June 17, 2013).
- Re Investigation Into Qualifying Facility Contracting and Pricing, Docket No. UM 1610, PacifiCorp Post-Hearing Brief (June 17, 2013)
- Re Investigation into Qualifying Facility Contracting and Pricing, Docket No. UM 1610, Idaho Power Post-Hearing Brief (June 17, 2013).
- Re Investigation Into Qualifying Facility Contracting and Pricing, Docket No. UM 1610, Order No. 14-058 (Feb. 24, 2014).
- <u>Re Investigation Into Qualifying Facility Contracting and Pricing</u>, Docket No. UM 1610, Idaho Power's Compliance Filing (Apr. 25, 2014).
- <u>Re Investigation Into Qualifying Facility Contracting and Pricing</u>, Docket No. UM 1610, PGE's Supplemental Filing to Update Schedule 201 (Nov. 25, 2014).
- Re Investigation Into Qualifying Facility Contracting and Pricing, Docket No. UM 1610, Order No. 14-435 (Dec. 16, 2014).
- Re Investigation into Qualifying Facility Contracting and Pricing, Docket No. UM 1610, Order No. 15-130 (Apr. 16, 2015).
- Re Investigation into Qualifying Facility Contracting and Pricing, Docket No. UM 1610, PacifiCorp Phase II Opening Testimony (May 22, 2015).
- Re Investigation into Qualifying Facility Contracting and Pricing, Docket No. UM 1610, PGE's Compliance Filing (May 27, 2015).
- <u>Re Investigation into Qualifying Facility Contracting and Pricing</u>, Docket No. UM 1610, REC Reply Testimony (Aug. 7, 2015).
- Re Investigation into Qualifying Facility Contracting and Pricing, Docket No. UM 1610, Order No. 16-174 (May 13, 2016).
- <u>Re Investigation Into Qualifying Facility Contracting and Pricing</u>, Docket No. UM 1610, PGE's Compliance Filing (July 12, 2016).
- Re Idaho Power Co. Applications to Lower Standard Contract Eligibility Cap and to Reduce the Standard Contract Term, Docket No. UM 1725, Order No. 15-199 (June 23, 2015).
- Re Idaho Power Co. Application to Lower Standard Contract Eligibility Cap and to Reduce the Standard Contract Term, Docket No. UM 1725, REC Response Testimony (Aug. 31, 2015).
- Re Idaho Power Co. Application to Lower Standard Contract Eligibility Cap and to Reduce the Standard Contract Term, Docket No. UM 1725, Order No. 16-129 (Mar. 29, 2016).
- Re Idaho Power Co. Application to Lower Standard Contract Eligibility Cap and to Reduce the Standard Contract Term, Docket No. UM 1725, CREA and Coalition Motion for Clarification (Apr. 12, 2016)
- Re Idaho Power Co. Application to Lower Standard Contract Eligibility Cap and to Reduce the Standard Contract Term, Docket No. UM 1725, PGE Response in

- Opposition to Motion for Clarification (Arp. 29, 2016).
- Re Idaho Power Co. Application to Lower Standard Contract Eligibility Cap and to Reduce the Standard Contract Term, Docket No. UM 1725, Staff Response to Motion for Clarification (May 6, 2016).
- Re Idaho Power Co. Application to Lower Standard Contract Eligibility Cap and to Reduce the Standard Contract Term, Docket No. UM 1725, Order No. 16-175 (May 16, 2016).
- Re PacifiCorp, dba Pacific Power, Application to Reduce the Qualifying Facility Contract Term and Lower the Qualifying Facility Standard Contract Eligibility Cap, Docket No. UM 1734, PacifiCorp Application (May 21, 2015).
- Re PacifiCorp, dba Pacific Power, Application to Reduce the Qualifying Facility Contract Term and Lower the Qualifying Facility Standard Contract Eligibility Cap, Docket No. UM 1734, REC's Response Testimony, Coalition/100, Lowe/3, 17-18 (Oct. 15, 2015).
- Re PacifiCorp, dba Pacific Power, Application to Reduce the Qualifying Facility
 Contract Term and Lower the Qualifying Facility Standard Contract Eligibility Cap,
 Docket No. UM 1734, PacifiCorp Reply Testimony (Dec. 10, 2015)
- Re PacifiCorp, dba Pacific Power, Application to Reduce the Qualifying Facility Contract Term and Lower the Qualifying Facility Standard Contract Eligibility Cap, Docket No. UM 1734, Order No. 16-130 (Mar. 29, 2016).
- Re Investigation Into Resource Sufficiency Pursuant to Order No. 06-538, Docket No. UM 1396, Order No. 11-505 (Dec. 13, 2011).
- <u>PGE Request for Proposals for Renewable Resources</u>, Docket No. UM 1535, PGE's Final Draft Request for Capacity and Baseload Energy Resources (Jan. 25, 2012).
- PGE Request for Proposals for Renewable Energy Resources, Docket No. UM 1613, PGE's Revised Draft Request for Proposals (Sept. 10, 2012).
- Re PGE Request for General Rate Revision, Docket No. UE 294, Order No. 15-356 (Nov. 3, 2015).
- Re PGE Information of QF Contracts or Summaries per OAR 860-029-0020(1), Docket No. RE 143, Informational Filing at PaTu Wind Farm, LLC PPA (Sept. 19, 2014).
- Re PGE Information of QF Contracts or Summaries per OAR 860-029-0020(1), Docket No. RE 143, Informational Filing at OneEnergy Oregon Solar, LLC PPA (Sept. 19, 2014).
- Re PGE Information of QF Contracts or Summaries per OAR 860-029-0020(1), Docket No. RE 143, Informational Filing at City of Gresham PPA (Sept. 19, 2014).
- Re PGE Information of QF Contracts or Summaries per OAR 860-029-0020(1), Docket No. RE 143, Informational Filing at Port of Tillamook Bay PPA (Sept. 19, 2014).
- Re PGE Information of QF Contracts or Summaries per OAR 860-029-0020(1), Docket No. RE 143, Informational Filing at Minikahda Hydropower PPA (Sept. 19, 2014).
- Re PGE Information of QF Contracts or Summaries per OAR 860-029-0020(1), Docket No. RE 143, Informational Filing at SORT Bioenergy, LLC PPA (Jan. 12, 2016).

- Re PGE Information of QF Contracts or Summaries per OAR 860-029-0020(1), Docket No. RE 143, Informational Filing at Morrow Solar LLC PPA (Feb. 11, 2016).
- Re PGE Information of QF Contracts or Summaries per OAR 860-029-0020(1), Docket No. RE 143, Informational Filing at OE Solar 1 PPA (Feb. 11, 2016).
- Re PGE Information of QF Contracts or Summaries per OAR 860-029-0020(1), Docket No. RE 143, Informational Filing at OE Solar 2 PPA (Feb. 11, 2016).
- Re PGE Information of QF Contracts or Summaries per OAR 860-029-0020(1), Docket No. RE 143, Informational Filing at OE Solar 3 PPA (Feb. 9, 2016).
- Re PGE Information of QF Contracts or Summaries per OAR 860-029-0020(1), Docket No. RE 143, Informational Filing at OE Solar 4 (Mar. 31, 2016).
- Re PGE Information of QF Contracts or Summaries per OAR 860-029-0020(1), Docket No. RE 143, Informational Filing at NorWest Energy 14 PPA Apr. 12, 2016).
- Re PGE Information of QF Contracts or Summaries per OAR 860-029-0020(1), Docket No. RE 143, Informational Filing at NorWest Energy 16 PPA (Apr. 12, 2016).
- Re PGE Information of QF Contracts or Summaries per OAR 860-029-0020(1), Docket No. RE 143, Informational Filing at Energy Partners I PPA (Sept. 14, 2016).
- Re PGE Information of QF Contracts or Summaries per OAR 860-029-0020(1), Docket No. RE 143, Informational Filing at Energy Partners II PPA (Sept. 14, 2016).
- PGE Advice No. 96-21 (Oct. 31, 1996).
- PacifiCorp Advice No. 99-004 (May 20, 1999).
- Idaho Power Advice No. 99-02 (Dec. 9, 1999).
- Idaho Power Advice No. 16-14 (Oct. 31, 2016)

III. CONCLUSION

For the reasons stated above, the Commission should take official notice of the various documents listed above.

Dated this 30th day of May 2017.

Respectfully submitted,

Irion Sanger

Sidney Villanueva

Sanger Law, PC

1117 SE 53rd Avenue

Portland, OR 97215

Telephone: 503-747-7533

Fax: 503-334-2235

irion@sanger-law.com

Of Attorneys for Northwest and Intermountain

Power Producers Coalition

Of Attorneys for Community Renewable Energy

Association

Of Attorneys for Renewable Energy Coalition