

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 1752

In the Matter of)	
)	COMMENTS OF OBSIDIAN
PORTLAND GENERAL ELECTRIC,)	RENEWABLES, LLC
)	
Revised Schedule 201 Qualifying Facility)	
Information, Consistent with the 2013)	
Integrated Resource Plan Update)	
)	

Obsidian Renewables, LLC (“Obsidian”) respectfully submits these comments in opposition to Portland General Electric’s (“PGE”) proposed mid-cycle changes to its Schedule 201 avoided cost rates. Obsidian has reviewed and largely agrees with the comments filed in this docket by the Renewable Energy Coalition (“REC”), Community Renewable Energy Association and Cypress Creek Renewables, LLC. The Commission’s prior orders establish a clear framework for utilities to make frequent but predictable updates to their avoided cost rates. PGE’s filing falls outside of this framework and directly defies the Commission’s prior orders. PGE fails to offers any evidence that would substantiate the need for the Commission to either modify or depart from its prior orders. Obsidian agrees with REC that there should be consequences to deter PGE and other purchasing utilities from willfully ignoring or otherwise violating their PURPA obligations. PGE’s actions in this case further highlight the need for the Commission to adopt clear and legally enforceable administrative rules to implement PURPA.

DATED this 5th day of January, 2016.

/s/ Richard G. Lorenz

Richard G. Lorenz, OSB No. 003086

Cable Huston LLP

1001 SW Fifth Avenue, Suite 2000

Portland, OR 97204-1136

(503) 224-3092 (Telephone)

rlorenz@cablehuston.com

Attorney for

Obsidian Renewables, LLC