

## RENEWABLE ENERGY COALITION

12050 SW TREMONT ST.  
PORTLAND, OR 97225

May 8, 2016

Commission Chair Susan Ackerman  
Commissioner John Savage  
Commissioner Steve Bloom  
Oregon Public Utility Commission  
201 High St SE, Suite 100  
Salem, Oregon 97301

RE: REC's Comments to NIPPC's Petition for Temporary Rulemaking and  
Investigation Docket Nos. AR 598/UM 1771

Dear Commissioners:

My name is John R. Lowe and I am the Executive Director of the Renewable Energy Coalition ("REC"). REC supports the Northwest and Intermountain Power Producers Coalition ("NIPPC") petition for a temporary rulemaking and investigation into PacifiCorp's 2016 request for proposals, and recommends that the Oregon Public Utility Commission ("OPUC") take some action to protect wholesale electricity markets, non-utility generators, and ratepayers.

REC is comprised of over thirty members who own and operate non-intermittent or base-load community scale renewable energy projects in Oregon, Idaho, Washington, Utah, and Wyoming. REC's membership includes several types of entities, such as irrigation districts, water districts, corporations, electric cooperatives, and individuals. Since some members own and operate more than one generation project, there are over fifty projects currently represented and all but one are 7 MW or smaller. All projects represented by REC are existing projects, and some members are interested in developing new renewable energy facilities.

REC is interested in protecting and enhancing competition in wholesale electricity markets because all of its members are independent power producers. Numerous actions, especially recently by the public utilities regulated by the OPUC have been contrary to maintaining reasonable balance in the providing of resources. REC's members are all qualifying facilities who have a statutory right under the Public Utility Regulatory Policies Act ("PURPA") to sell power to electric utilities like PacifiCorp. Other non-utility owned generators should also have the ability to sell power to PacifiCorp through long-term power purchase agreements. Healthy markets that have multiple options will lower electricity costs, benefit utility consumers, and improve local communities. In most cases REC's members have only one reasonable opportunity to sell to the

interconnected local utility. A stable and predictable environment for the establishment of avoided cost prices potentially could be impacted by sudden resource acquisitions.

On behalf of REC, we appreciate your consideration of our comments.

Respectfully,

A handwritten signature in black ink, appearing to read "John R. Lowe". The signature is fluid and cursive, with a prominent initial "J" and "L".

John R. Lowe  
Executive Director