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Subject: AOC Comments on AR 622 Rulemaking -- SMALL SCALE RENEWABLE ENERGY PROJECTS
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On Behalf of the Association of Oregon Counties, I am writing in support of the CREA/REC comments submitted earlier today for this AR 622 rulemaking.

Basically, we strongly support smaller scale, commercial, renewable energy development in Oregon. This was the purpose of our sponsorship of the bills before the legislature.

Because there are several unknowns in the final language, it is important that these rules contain

- Clear definitions, especially because the shift to a capacity-based measurement creates issues not easily resolved;
- Require projects be developed in Oregon;
- Projects that count must be subject to the RPS;
- At least 8% of the developed projects with electricity sold to Oregon customers must be achieved by 2025, and every year thereafter, and
- Begin reporting on progress by 2019

Since the renewable representatives, including AOC, have not been privy to the modeling done by ODOE since it was initially developed, we believe it could be important that the material is presented before final adoption of the PUC. It is hard for us to know how far the electric companies must go to achieve what the legislation requires.

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