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July 8, 2021

Via Electronic Filing

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

Re: In the Matter of ALLIANCE OF WESTERN ENERGY CONSUMERS
Petition for a General Investigation into Long-Term Direct Access Programs.
Docket No. UM 2024

Dear Filing Center:

Please find enclosed the Comments of the Alliance of Western Energy Consumers in the above-referenced docket.

Thank you for your assistance. If you have any questions, please do not hesitate to call.

Sincerely,

/s/ Jesse O. Gorsuch
Jesse O. Gorsuch

Enclosure

BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

UM 2024

In the Matter of)
) COMMENTS OF THE ALLIANCE OF
ALLIANCE OF WESTERN ENERGY)
CONSUMERS,)
)
)
Petition for a General Investigation into Long-)
Term Direct Access Programs.)
)
_____)

I. INTRODUCTION

On June 10, 2019, the Alliance of Western Energy Consumers (“AWEC”) petitioned the Public Utility Commission of Oregon (“Commission”) to open a general investigation into long-term direct access programs. On August 15, 2019, the Commission adopted Commission Staff’s (“Staff”) recommendation and granted AWEC’s petition, opening Docket No. UM 2024. On June 30, 2021, Staff submitted a framework for a procedural schedule in Docket No. UM 2024, proposing that parties be permitted to file comments on the procedural schedule.

II. COMMENTS

AWEC supports Staff’s proposed procedural schedule in the above-referenced docket. AWEC agrees with Staff’s assertion that Docket No. UM 2024 is broad enough to move forward separate from Docket No. UM 2143. Docket No. UM 2024 was opened to ensure that

direct access programs are designed to work for all customers, including both participating and non-participating customers. Docket No. UM 2143 was opened in order to investigate resource adequacy in Oregon. As Staff correctly notes, although related, Docket No. UM 2024 and Docket No. UM 2143 may proceed independently.

Staff's proposed procedural schedule in Docket No. UM 2024 provides sufficient time for discovery to take place and for parties to develop straw proposals. Staff's proposal of two rounds of simultaneous testimony following the submission of straw proposals is similarly reasonable.

III. CONCLUSION

AWEC appreciates the opportunity to provide comments on Staff's proposed framework for a procedural schedule in this proceeding and looks forward to working with the Commission and the parties to this docket.

Dated this 8th day of July, 2021.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Tyler C. Pepple

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