



**RICHARDSON ADAMS, PLLC**  
**ATTORNEYS AT LAW**

richardsonadams.com  
Tel: 208-938-7900 Fax: 208-938-7904  
P.O. Box 7218 Boise, ID 83707 - 515 N. 27th St. Boise, ID 83702

August 8, 2019

*VIA ELECTRONIC FILING*

Commission Chair Megan Decker  
Commissioner Stephen Bloom  
Commissioner Letha Tawney  
Public Utility Commission of Oregon  
201 High Street SE, Suite 100  
Salem, Oregon 97301-3398

RE: UM 2024 – Comments of Calpine Energy Solutions, LLC

Dear Commissioners:

I write on behalf of Calpine Energy Solutions, LLC (“Calpine Solutions”) in support of Staff’s proposal to grant the Alliance of Western Energy Consumers’ (“AWEC”) petition to open a generic proceeding to investigate direct access issues.

Calpine Solutions and its predecessors have served Oregon customers as an electricity service supplier (“ESS”) in the Oregon Public Utility Commission’s (“Commission”) direct access programs for over a decade and have regularly participated in Commission proceedings during that time. As a party to the stipulation in Portland General Electric Company’s last general rate case (UE 335) and to the PacifiCorp stipulation referenced in AWEC’s petition, Calpine Solutions agrees that a generic investigation into the issues identified in AWEC’s petition is appropriate.

Additionally, a generic investigation would provide a suitable forum to address issues related to resource adequacy that PGE and Calpine Solutions have raised. In the ongoing Docket No. UE 358, PGE has proposed to assess new capacity-based charges (known as the “RIC” and “RAD”) to direct access customers in the New Large Load Direct Access program. Given the time constraints in that docket and the impact it will have on other direct access programs, Calpine Solutions and other parties, including Staff, have recommended that the resource adequacy issues raised by PGE be addressed in a generic proceeding. A generic proceeding provides the benefit of the ability to consider multiple solutions to the resource adequacy issues for the Commission to consider. For example, other states have addressed the same capacity and reliability concerns by assigning resource adequacy requirements to retail suppliers (i.e. ESSs), and have provided customers with the option to purchase the capacity-based products

Oregon Public Utility Commissioners

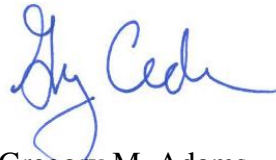
August 8, 2019

Page 2

PGE proposes to provide from the competitive wholesale market as opposed to requiring that such services be purchased from the balancing authority/incumbent distribution utility.

In sum, opening this investigation would provide a venue to consider all available options to address the capacity and reliability issues PGE recently raised in Docket No. UE 358, as well as the other important issues listed in AWEC's petition. Calpine Solutions supports Staff's proposal that the Commission grant AWEC's petition to open an investigation into direct access issues.

Sincerely,



Gregory M. Adams

RICHARDSON ADAMS, PLLC

Attorney for Calpine Energy Solutions, LLC