

To: puc.filingcenter@state.or.us

From: Oregon Solar Energy Industries Association, Paul N. Israel, President

Re: AR 593

The Oregon Solar Energy Industries Association (OSEIA) founded in 1981 represents 70 major solar stakeholders around the state. Our members have installed most all solar grid tied electric systems in the state. We are 501c6 organization.

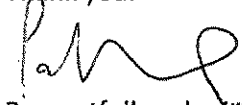
OSEIA is submitting these comments in support of the rulemaking requested by Obsidian Renewables in AR 593. OSEIA agrees that it is important to have clear and fair administrative rules in Oregon concerning the terms and conditions of power sales from renewable qualifying facilities (QFs) under PURPA. Please add Paul N. Israel, President and Chairman to the service list for this rulemaking proceeding on behalf of OSEIA. Paul N. Israel contact information is: paul@sunlightsolar.com, 50 SE Scott, Building #13, Bend, OR 97702. 541/322-1910 x309.

OSEIA is committed to furthering the State of Oregon's policy of increasing renewable electricity generation and displacing electricity generating resources that burn fossil fuels. PURPA can and should be a critical part of meeting the State's important policy goals. Several of the purchasing utilities have been aggressively urging the Oregon Public Utility Commission ("Commission") to change its PURPA policies to make it even more difficult to build a QF project, and we think those issues and the broader policy implications should be addressed in rulemaking.

OSEIA has reviewed the legal arguments raised by Obsidian in its request for rulemaking and finds them compelling. The Oregon Administrative Procedures Act clearly applies to the rulemaking process.

Beyond the legal arguments, the terms and conditions of PURPA sales should be established through a rulemaking process as a matter of good public policy. It is awkward and difficult for some interested persons and groups to participate in the contested case proceedings because they require considerable expense and resources to hire lawyers and expert consultants and to litigate in a trial-type proceeding. OSEIA will, however, participate vigorously and meaningfully in the rulemaking by and through its own staff and sharing its and its members own expertise. The policies adopted by the Commission through this rulemaking will not only be lawful, they will be more transparent, democratic, and better-informed.

Thank you.



Respectfully submitted,