



December 18, 2015

To: PUCFilingCenter@state.or.us
From: Oregonians for Renewable Energy Progress
Re: AR 593

Oregonians for Renewable Energy Progress (OREP) submits these comments in support of Obsidian Renewable LLC's petition for rulemaking in AR 593.

OREP and its over nine hundred members advocate for Oregon's transition from fossil fuels to locally-generated, clean renewable energy. We believe that a suspension of PURA contracting is unnecessary, is contrary to the interests of Oregon's citizen and contrary to the expressed goals of the Legislature.

ORS 469A.210 provides:

"The Legislative Assembly finds that community-based renewable energy projects . . . are an essential element of Oregon's energy future, and declares that it is the goal of the State of Oregon that by 2025 at least eight percent of Oregon's retail electrical load comes from small-scale renewable energy projects with a generating capacity of 20 megawatts or less. All agencies of the executive department as defined in ORS 174.112 shall establish policies and procedures promoting the goal declared in this section. (emphasis added)

We live in a rapidly changing climate. Procedural delay in implementing the State's renewable energy goal, agency by agency, docket by docket, is death by a thousand cuts to progress on climate change. OREP is not aware of any PURPA QF solar facilities in Oregon. There is simply no need for a suspension of PURPA contracting. Power sales from PURPA QFs should be part of Oregon's solution to reliance on coal-fired generation and should be responsibly accelerated, rather than stalled.

We agree with the comments of other parties that Oregon's Administrative Procedures Act requires a rulemaking rather than a contested case proceeding. Public hearing and public access are important to the credibility of the results of the docket; a rulemaking will allow a more thorough and open participation by parties of interest. Coherent, fair public policy will be advanced by a rulemaking proceeding and will comply with legal precedents cited by other commenters.



OREP intends to monitor and participate in this docket. Please add Mark Pengilly to the service list as the representative of OREP; contact information is mpengilly@gmail.com, 503.860.6410, P.O. Box 10221, Portland, OR 97296.

Thank you.

Respectfully submitted,

Mark Pengilly