

July 10, 2018

VIA ELECTRONIC FILING

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

Re: Docket No. AR 593: In the Matter of Obsidian Renewables LLC Petition to Amend OAR 860-029-0040, Relating to Power Purchases by Public Utilities From Small Qualifying Facilities.

Dear Commissioners:

Idaho Power Company, PacifiCorp d/b/a Pacific Power, and Portland General Electric Company (collectively, Joint Utilities) submit this letter to the Public Utility Commission of Oregon (Commission) regarding Commission Staff's proposed revisions to OAR Division 29 --the Commission's current rules implementing the Public Utility Regulatory Policies Act (PURPA), circulated on July 3, 2018 (Draft Rules).

The Joint Utilities commend Staff's hard work in developing Draft Rules that reflect the Commission's current PURPA implementation policies, and have appreciated the opportunity to work collaboratively on the Draft Rules with Staff and other stakeholders to date. The Joint Utilities look forward to providing additional comments and proposals to fine tune the rules in the formal rulemaking proceeding.

Sincerely yours,



Lisa Rackner