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March 20, 2018

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 PORTLAND GENERAL ELECTRIC CO.
Application to Lower the Standard Price and Standard Contract Eligibility Cap for
Solar Qualifying Facilities
Docket No. UM 1854

Dear Filing Center:

Please find enclosed the Response of the Industrial Customers of Northwest Utilities to the Motion to Suspend Procedural Schedule of the Northwest and Intermountain Power Producers Coalition and the Renewable Energy Coalition.

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 1854

In the Matter of)	
)	
PORTLAND GENERAL ELECTRIC)	RESPONSE OF THE INDUSTRIAL
COMPANY)	CUSTOMERS OF NORTHWEST
)	UTILITIES
Application to Lower the Standard Price and)	
Standard Contract Eligibility Cap for Solar)	
Qualifying Facilities.)	
_____)	

I. INTRODUCTION

Pursuant to OAR 860-001-0420(4), the Industrial Customers of Northwest Utilities (“ICNU”) files this response to the March 16, 2018 Motion to Suspend Procedural Schedule (“Motion”), filed by the Northwest and Intermountain Power Producers Coalition (“NIPPC”) and the Renewable Energy Coalition (“the Coalition” and, collectively with NIPPC, the “QF Parties”) with the Oregon Public Utility Commission (“the Commission”) in the above-captioned docket. In their Motion, the QF Parties request that the Commission suspend the existing procedural schedule and hold this proceeding in abeyance in order to allow the parties to focus their attention on reaching a settlement. ICNU agrees with Portland General Electric Company (“PGE”) that prompt resolution of this matter is in the best interest of its customers and, therefore, opposes indefinite suspension of the procedural schedule. ICNU is willing to agree to PGE’s proposal to extend the deadline for Staff and intervenor testimony by three weeks, although it considers even this to be a considerable delay.

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II. RESPONSE

ICNU remains concerned that PGE's renewable avoided costs are well above what the market can provide and, consequently, that customers continue to be harmed the longer the issues in this docket remain unresolved. As conceded by the QF Parties in their Motion, the parties in this docket have not reached a settlement.^{1/} For this reason, ICNU disagrees with the QF Parties' claim that indefinitely suspending the procedural schedule is in the best interests of all parties in this docket. It is, instead, only in the best interests of the QF Parties, which are the only parties that benefit from further delay. Abandoning the procedural schedule at this time will eliminate any incentive the QF Parties have to work towards settlement. This is particularly inappropriate because the Motion asks that a new procedural schedule be adopted only *after* a settlement is not reached. The Commission's statutory duties relate to the interests of PGE's customers, not to the interests of third-party power producers, except to the extent these two interests coincide.^{2/} In this case they do not, and the Commission should act to protect customers.

III. CONCLUSION

For the reasons set forth above, ICNU respectfully requests that the Commission reject the QF Parties' Motion. Given the imminent deadline for response testimony in this docket, ICNU does not oppose a modest extension of this due date and, therefore, is willing to support PGE's request that the deadline for filing testimony in this proceeding be extended by three weeks.

^{1/} QF Parties' Motion at 1.

^{2/} ORS 756.040.

Dated this 20th day of March, 2018.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Tyler C. Pepple

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