

February 22, 2019

Via Email

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

RE: Investigation into Interim PURPA Action, UM 2001

Dear Commissioners:

The undersigned stakeholders submit these joint comments regarding the Oregon Public Utility Commission (the “Commission” or “OPUC”) potential interim action under the Public Utility Regulatory Policies Act (“PURPA”). These comments reflect the collected recommendations of Oregon’s non-utility renewable energy organizations and companies. We appreciate the opportunity to submit comments on these issues that are important to meeting Oregon’s renewable energy and climate goals. The Commission is considering:

- Opening an investigation into PURPA implementation in Oregon, including addressing the concerns of non-utility stakeholders that the utilities’ avoided cost rates appear to be lower than their actual avoided costs;
- Reducing the size threshold for standard qualifying facility (“QF”) rates to 100 kilowatts (“kW”)—the current size threshold is 10 megawatts (“MW”) for most resource types and 3 MW for solar;
- Reducing the utilities’ avoided cost prices before the regularly scheduled May 1 update; and
- Requiring the utilities to begin making available to any future QF project application certain additional interconnection information identified by Staff and non-utility stakeholders.

On each of the four topics listed above, we recommend that the Commission:

- Investigate some issues related to PURPA implementation in Oregon, including the concerns of non-utility stakeholders that the utilities’ avoided cost rates appear to be lower than their actual avoided costs;
- Not reduce the size threshold for standard QF rates to 100 kW;
- Not reduce the utilities’ avoided cost prices before the regularly scheduled May 1 update; and
- Require the utilities to begin making available to any future QF project application certain additional interconnection information identified by Staff and non-utility stakeholders.

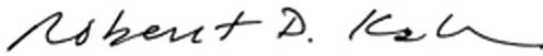
Thank you for the opportunity to comment.



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Brian Skeahan
Community Renewable Energy Association



Robert Kahn
Northwest and Intermountain Power Producers Coalition



Nicole Hughes
Renewable Northwest

Angela Crowley-Koch

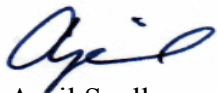
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Sara Birmingham

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Gloria Smith

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Energy Vision LLC

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The Environmental Center

Les Perkins
Farmers Irrigation District

Daniel Kennedy
Future Systems Enterprises

Judge Pete Runnels
Harney County Commissioner

William Hampton
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Oregon Windfarms, LLC

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Patu Wind farm

Ben Catt
Pine Gate Renewables

Ryan Meyer
PNW Solar

Christoph Heinzer
Pueblo Energy Holdings, LLC

Andy J. Root
Rattlesnake Creek Land & Cattle Company, LLC
ACW, Inc. (equipment rental, civil contractor)

Brent Stevenson
Santiam Water Control District

Ted Sorenson
Sorenson Engineering
Sprague Hydro LLC
C-Drop Hydro LLC

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