



Oregon Public Utility Commission
201 High Street SE, Suite 100
Salem, OR 97301-3398

January 12, 2021

Dear Chair Decker, Commissioner Tawney and Commissioner Thompson,

The Oregon Solar Energy Industries Association (OSEIA) and Renewable Northwest (RNW) submit the following comments to UM 2143.

First, we recommend that the OPUC establish in docket UM 2143 a robust stakeholder process to understand, analyze and address any near-term capacity procurements and needs in the state prior to the start of the regional Resource Adequacy (RA) program. Interlinkages between the effort in this docket and other dockets like UM 2011 should be addressed and reconciled to avoid duplication of efforts.

Second, we recommend that the OPUC coordinate with NWPP's regional RA program to conduct state-level oversight with particular interest in ensuring transparency and fairness for: capacity contribution/accreditation of all resources including but not limited to renewables, hybrids, standalone storage, demand response resources and other hybrid and emerging technologies, as well as other RA contributions. This mechanism could be an interlinkage covered in detail in the UM 2011 docket, especially focusing on methodologies to fairly assess the capacity and RA contributions of all resources.

OSEIA and RNW support opening UM 2143 as a dedicated docket highlighting that while the NWPP process has been helpful and informative, we recommend that the PUC not assume the NWPP will resolve regional RA issues fully.

Lastly, OSEIA and RNW have concerns about the possibility of this docket becoming a contested case. While both PGE and CUB have indicated that they think a contested case will be necessary, Staff has taken a middle road. Specifically, the Staff Report indicates that Staff desires "considerable stakeholder involvement," and in the schedule proposed on page 6 of the Staff Report, Staff proposes to initially begin with a workshop process "to determine the need and scope of a contested case." While the schedule appears to assume a second phase structured as a contested case, that outcome would likely be inconsistent with the goal of ensuring considerable stakeholder involvement throughout the Commission's RA process. This docket may become too resource intensive for non-profit engagement if it becomes a contested case, resulting in a real lack of stakeholder involvement during the docket's operative phase.

Sincerely,

A handwritten signature in black ink that reads "Angela Crowley-Koch".

Angela Crowley-Koch
Executive Director
Oregon Solar Energy Industries Association

A handwritten signature in blue ink that reads "Max Greene".

Max Greene
Regulatory & Policy Director
Renewable Northwest