

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 1910

In the Matter of)	
)	
PACIFICORP, dba PACIFIC POWER)	OREGON DEPARTMENT OF ENERGY'S
)	COMMENTS IN LIEU OF REPLY
PacifiCorp Resource)	TESTIMONY
Value of Solar)	
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The Department has no additional comments to add at this time, but continues to follow the proceeding and reiterates its interest in working with other parties to continue to refine the resource value of solar (RVOS) calculations and values over time. In particular, ODOE looks forward to participating in future efforts to quantify the grid services element of the RVOS, including the contributions of smart inverters, energy storage systems and other advanced technologies.

DATED this 20th day of April, 2018.

Respectfully submitted,

ELLEN F. ROSENBLUM
Attorney General

/s/ Jesse D. Ratcliffe

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Natural Resources Section