

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM _____

In the Matter of

PORTLAND GENERAL ELECTRIC
COMPANY

Application to Lower the Standard Price and
Standard Contract Eligibility Cap for Solar
Qualifying Facilities.

**PORTLAND GENERAL ELECTRIC’S
MOTION FOR INTERIM RELIEF**

Expedited Consideration Requested

I. INTRODUCTION

Pursuant to OAR 860-001-0420, Portland General Electric Company (“PGE”) moves for interim relief to prevent substantial and irreparable harm to PGE’s customers while the Public Utility Commission of Oregon (“Commission”) considers PGE’s June 30, 2017 *Application to Lower the Standard Price and Standard Contract Eligibility Cap for Solar Qualifying Facilities* (“Application”). Specifically, PGE requests the Commission issue a temporary order:

1. Lowering the eligibility cap for a solar qualifying facility (“QF”) to obtain standard avoided cost prices (“standard prices”) from 10 megawatts (“MW”) to 3 MW;
2. Declaring that a solar QF with capacity above 100 kilowatts (“kW”) is not eligible for a standard contract or standard prices from PGE if any owner of the solar QF has requested or obtained standard prices from PGE for more than 10 MW of aggregate solar QF capacity;
3. In the alternative, a temporary order lowering the eligibility cap for a solar QF to obtain standard prices to 2 MW.

This interim relief is the same relief PGE has requested as permanent relief in PGE’s June 30, 2017 Application. PGE respectfully requests that the interim relief become effective June 30, 2017, and remain in effect until the Commission has issued an order granting or denying the permanent relief requested in the Application. PGE further requests that the interim relief apply to all requests for PURPA contracts pending before PGE that have not achieved a legally

enforceable obligation, as defined in Order No. 16-174,¹ prior to June 30, 2017. PGE further requests expedited consideration of this motion due to the likelihood that PGE may be required to enter into 41 or more new solar PURPA contracts for combined output of 417.2 MW or more before the Commission will have an opportunity to issue a decision on the permanent relief requested in PGE's concurrently filed Application.² This motion is supported by PGE's Application and by the testimony of PGE witnesses Robert Macfarlane and Brett Sims filed in support of the Application; both the Application and PGE's testimony are incorporated herein by this reference.

II. ARGUMENT

A. Interim Relief is Necessary to Protect PGE's Customers from Significant Harm.

As detailed in the Application and in the testimony of Robert Macfarlane and Brett Sims submitted in support of the Application, PGE is experiencing tremendous growth in QF activity. The number of megawatts of QF generation under long-term contract with PGE has increased more than seven-fold in approximately three years, increasing from 68 MW when the Commission issued Order No. 14-058 on February 24, 2014, to a current level of 467.5 MW.³ More importantly for the purpose of this motion and PGE's Application, as of June 5, 2017, PGE was confronted with pending requests for new long-term PURPA contracts from 47 proposed QF projects representing 487.4 MW of new QF capacity, including 41 solar QF representing 417.2 MW of capacity.⁴ If all of these requests proceed to contract, PGE will have 954.9 MW of QF capacity under contract, a 15-fold increase since February 2014.⁵ At this level of PURPA contract commitment, PGE's customers will face more than \$3 billion in PURPA costs over the next 15 years.⁶

¹ See Docket No. UM 1610, Order No. 16-174 at 27 (May 13, 2016) (indicating that a legally enforceable obligation exists when a QF signs a final draft of an executable standard contract).

² PGE/102, Sims – Macfarlane/9.

³ PGE/102, Sims – Macfarlane/2.

⁴ Sims – Macfarlane/2 and 9.

⁵ Sims – Macfarlane/2.

⁶ PGE/105, Sims – Macfarlane/12.

Under the Commission's currently effective orders, PGE is required to enter into standard contracts with, and pay standard prices to, QFs with nameplate capacity of 10 MW or less.⁷ Standard contracts and standard prices are generic and do not take into account project-specific avoided cost or other project specific considerations.⁸ Standard prices are less accurate than negotiated project-specific prices and can result in PGE's customers paying more than avoided cost for the output of a QF project. Applying a relatively high 10 MW eligibility cap to so much new QF output will result in contracts with long-term fixed prices that substantially exceed PGE's actual avoided costs. Applying a 10 MW threshold for standard prices to the pending requests for combined solar QF output of 417.2 MW and locking in inaccurate standard prices for 15 years will result in substantial and irreparable harm to PGE's customers. PGE estimates that the value of these payments to Solar QF projects would exceed expected market prices by \$545 million over the next 15 years.⁹

Under the timelines established by PGE's Schedule 201, it is likely that the 417.2 MW worth of solar QF contract requests facing PGE will be processed, and new contracts executed, before the Commission resolves PGE's Application for permanent relief.¹⁰ Moreover, PGE expects that additional requests for standard PPAs will continue to accrue while the Commission investigates PGE's Application. Indeed, in the absence of all of the interim relief requested in this motion, PGE expects a renewed rush of contract requests from solar QF developers seeking to secure long-term, standard price contracts before the Commission completes its investigation and potentially grants the permanent relief requested in the Application. Without the requested interim relief, PGE will be required to enter into a large number of long-term contracts at

⁷ Docket No. 1129, Order No. 05-584 at 16 (May 13, 2005); Docket No. UM 1610, Order No. 14-058 at 7-8 (February 23, 2014).

⁸ Docket No. 1129, Order No. 05-584 at 16 (May 13, 2005) ("With standard contracts, project characteristics that cause the utility's cost savings to differ from its actual avoided costs are ignored.").

⁹ PGE/107, Sims – Macfarlane/13.

¹⁰ See, Docket No. UM 1610, *PGE's Schedule 201 Qualifying Facility Information Compliance Filing*, Schedule 201 at Sheet No. 201-2 (July 12, 2016) (PGE's currently effective Schedule 201 outlining the process for developing a standard power purchase agreement ("Standard PPA") involving three generally 15-business day periods to develop a draft Standard PPA, a final draft Standard PPA, and an executable Standard PPA; any of these periods can take more than 15 business days if PGE requires additional or clarifying information from the QF developer or the developer takes additional time or revises its project proposal or the variable terms of the Standard PPA).

standard prices that exceed PGE's actual avoided costs, causing substantial and irreparable harm to PGE's customers.

B. Interim Relief is Consistent with Commission Precedent

PGE's request for interim relief is consistent with Commission precedent. On April 24, 2015, Idaho Power Company ("Idaho Power") was confronted with an unprecedented increase in QF activity and filed an application with the Commission to modify the Commission's orders implementing PURPA.¹¹ Idaho Power asked the Commission to reduce the eligibility cap for standard contracts for wind and solar QF projects to 100 kW and to reduce the term of negotiated contracts to two years.¹² This application was assigned to Docket No. UM 1725. On the same day it filed its application for permanent relief, Idaho Power filed a motion for a temporary stay of its obligation to enter into new power purchase agreements with QFs.¹³ In the alternative, the motion asked the Commission to temporarily grant the relief requested in Idaho Power's application.¹⁴ The Commission granted interim relief on June 23, 2015, in Order No. 15-199, temporarily lowering the eligibility cap for standard contracts for wind and solar QFs to 3 MW; this interim relief was made effective from the date Idaho Power filed its application and motion in UM 1725.¹⁵

In Order No. 15-199, the Commission noted that Idaho Power was facing unprecedented growth in QF activity.¹⁶ The Commission noted that Idaho Power had six operating QFs in Oregon with a combined output of 21 MW but that almost twice the number of QFs (11 projects) with more than five times the output (110 MW) were under contract but not yet operational, and that 26 solar QF projects with a combined output of 245MW were seeking contracts from Idaho

¹¹ Docket No. UM 1725, Idaho Power Company's Application to Lower Standard Contract Eligibility Cap and to Reduce the Standard Contract Term (Apr. 24, 2015).

¹² *Id.* at 1.

¹³ Docket No. UM 1725, Idaho Power Company's Motion for Temporary Stay of Its Obligation to Enter into New Power Purchase Agreements with Qualifying Facilities (Apr. 24, 2015).

¹⁴ *Id.* at 2.

¹⁵ Docket No. UM 1725, Order No. 15-199 at 8 (Jun. 23, 2015) ("Order Nos. 05-584 and 14-058 are amended to reduce, on an interim basis and effective April 24, 2015, the eligibility cap to 3 MW for standard contracts offered by Idaho Power Company to solar QF projects.").

¹⁶ Docket No. UM 1725, Order No. 15-199 at 6 (Jun. 23, 2015).

Power.¹⁷ The Commission also noted that Idaho Power had recently received applications to interconnect six QF projects with combined output of 55.5 MW.¹⁸ The Commission acknowledged that some of these solar QF projects might not be built. But the Commission concluded that, “Even using conservative estimates, we are convinced that a sufficient number of projects will proceed and eventually require Idaho Power, without some interim relief, to enter into substantial long term contracts that exceed the company’s actual avoided costs.”¹⁹ Based on the level of QF development faced by Idaho Power, the Commission held:

We conclude that this unprecedented pace and volume of QF development justifies interim relief in order to prevent harm to Idaho Power’s ratepayers. We further conclude that such relief should be narrow, targeted, and proportionate. To that end, we ... reduce the eligibility cap for Idaho Power’s standard contracts to 3 MW for solar QF projects.²⁰

In the instant case, PGE has more than three and a half times as many megawatts of QF output under contract and 70% more megawatts of QF output seeking PURPA contracts than did Idaho Power when it filed for, and obtained, interim relief in UM 1725.²¹ Even at the lower levels of QF activity faced by Idaho Power, the Commission decided the “unprecedented pace and volume of QF development [faced by Idaho Power] justified interim relief in order to prevent harm to Idaho Power’s ratepayers.”²² Clearly the level of QF activity faced by PGE is sufficient to justify interim relief to protect PGE’s customers.

On May 21, 2015, PacifiCorp also filed an application to modify the Commission’s orders implementing PURPA in response to significant growth in QF activity—the application

¹⁷ Docket No. UM 1725, Order No. 15-199 at 6 (Jun. 23, 2015)

¹⁸ *Id.*

¹⁹ *Id.*

²⁰ *Id.* at 7.

²¹ PGE has 14 operating QF projects with combined output of 21.2 MW. PGE/102. When it filed for relief in UM 1725, Idaho Power had six operating QFs with combined output of 21. PGE has 63 QF projects currently under contract and not online with combined output of 446.3 MW. PGE/102. This is three and a half times the 131 MW of combined QF output that Idaho Power had under contract when it applied for relief in UM 1725. PGE is facing requests for new contracts from 47 projects with a combined output of 487.4 MW. PGE/102, Sims – Macfarlane/2. This is 70% more than the 245 MW of new contract requests Idaho Power faced when it filed for, and obtained, interim relief in UM 1725. Sims – Macfarlane/9.

²² Docket No. UM 1725, Order No. 15-199 at 7 (Jun. 23, 2015).

was assigned to Docket No. UM 1734.²³ On July 9, 2015, PacifiCorp filed a motion for interim relief in UM 1734.²⁴ The Commission granted interim relief to PacifiCorp on August 14, 2015, in Order No. 15-241, temporarily lowering the eligibility cap for standard contracts for wind and solar QFs to 3 MW effective from the May 21, 2015, date PacifiCorp filed its application in UM 1734.²⁵ In Order No. 15-241, the Commission granted interim relief to PacifiCorp in response to “PacifiCorp claims that ... it had 338 MW of executed QF PPAs in Oregon and another 587 MW in active requests.”²⁶ The Commission recognized “that intervenors dispute some of PacifiCorp’s figures and raise questions about whether all of these QF projects will actually be built.”²⁷ Nevertheless, the Commission concluded:

PacifiCorp’s filings persuade us that there has been significant growth in QF development in its territory. Interim relief is appropriate to protect ratepayers from the possibility of being charged more than PacifiCorp’s avoided power costs during the pendency of our review. ... [W]e find sufficient reason to provide a modest measure of relief pending our further analysis of market conditions and Commission QF policies. Furthermore, as PacifiCorp notes, having granted Idaho Power’s request for interim relief in Order No. 15-199, a failure to provide a similar 3 MW cap on solar QF project eligibility to PacifiCorp might well encourage developers to engage in geographic arbitrage. ... Order Nos. 05-584 and 14-058 are amended to reduce, on an interim basis and effective May 21, 2015, the eligibility cap to 3 MW for standard contracts offered by PacifiCorp, dba Pacific Power to solar QF projects.²⁸

When PacifiCorp was granted this interim relief in UM 1734, it claimed to have 338 MW of executed QF contracts—PGE currently has 467.5 MW of executed QF contracts—and PacifiCorp claimed to have 587 MW of pending contract requests—PGE has 487.4 MW of pending contract requests.²⁹ When PacifiCorp’s motion for interim relief was granted, it appears that PacifiCorp had 480.1 MW of solar QF contract requests³⁰ and PGE is currently confronted

²³ Docket No. UM 1734, PacifiCorp’s Application to Reduce the Qualifying Facility Contract Term and Lower the Qualifying Facility Standard Contract Eligibility Cap (May 21, 2015).

²⁴ Docket No. UM 1734, PacifiCorp’s Motion for Interim Relief (July 9, 2015).

²⁵ Docket No. UM 1734, Order No. 15-241 at 3 (Aug. 14, 2015).

²⁶ *Id.* at 2.

²⁷ *Id.* at 3.

²⁸ *Id.*

²⁹ PGE/102, Sims – Macfarlane/2.

³⁰ Docket No. UM 1734, PAC/101, Griswald/2-3 (list of PacifiCorp’s Oregon solar QF requests as of May 1, 2015, indicating requests from 37 solar QF projects with combined output of 480.4 MW).

with contract requests for a combined solar QF project output of 417.2 MW.³¹ Clearly, the level of QF activity currently faced by PGE is similar to the level of QF activity faced by PacifiCorp when it was granted interim relief in UM 1734.

C. The Commission Should Grant Interim Relief Requiring Solar QF Projects Larger than 3 MW to Negotiate Project-Specific Avoided Cost Prices

The first form of interim relief requested by PGE is to reduce to 3 MW the eligibility cap for solar QFs to obtain standard prices from PGE. This is the same relief that Idaho Power and PacifiCorp were ultimately awarded on a permanent basis in UM 1725 and UM 1734.³² And it is narrower than the interim relief Idaho Power and PacifiCorp received in UM 1725 and UM 1734 which lowered the eligibility cap for standard contracts for wind and solar QF projects to 3 MW.³³ PGE is currently facing growth in solar QF activity that is at least as severe as that faced by PacifiCorp in UM 1734 and 70% more severe as that faced by Idaho Power in UM 1725.³⁴ If solar projects larger than 3 MW continue to receive standard prices, PGE faces many of the same risks of harm to its customers that were faced by PacifiCorp and Idaho Power in UM 1725 and UM 1734. If these requirements are allowed to remain in place, it is virtually guaranteed that PGE's customers will pay more than true avoided cost on more than 417.2 MW of new solar QF output. This could result in substantial harm to PGE's customers over the next 15 years as the payments are an estimated \$545 million more than if priced at expected market prices.³⁵

In Order No. 16-129, which reduced the eligibility cap applicable to Idaho Power, the Commission concluded:

Based on the evidence presented, we agree that single solar QF developers have developed multiple projects to avoid the 10 MW threshold [on standard prices]. Furthermore, there is evidence that solar developers can enter into negotiated

³¹ PGE/103, Sims – Macfarlane/9.

³² See Docket No. UM 1725, Order No. 16-129 at 6 (Mar. 29, 2016); Docket No. UM 1734, Order no. 16-130 at 5 (Mar. 29, 2016).

³³ Docket No. UM 1725, Order No. 15-199 at 7 (Jun. 23, 2015); Docket No. UM 1734, Order No. 15-241 at 3 (Aug. 14, 2015).

³⁴ See pages 5-6 *supra*.

³⁵ PGE/107, Sims – Macfarlane/13.

contracts for QF projects sized in the 4 to 10 MW range. According, we find that the eligibility threshold for solar projects should be 3 MWs.³⁶

In Order No. 16-130, which reduced the eligibility cap applicable to PacifiCorp, the Commission concluded:

Based on our review, we conclude that the threshold for standard contracts should be reduced on a more permanent basis. ... Although the vast majority of the projects [entering into QF contracts with PacifiCorp] were for 5 MW and above, and most were 10 MW, there were three that were 3 MW or less. This indicates that QF projects located in PacifiCorp's service area as small as 3 MW can be viable. Accordingly, we find that the eligibility threshold should be 3 MW for solar projects. We restrict our decision, however, to only the avoided cost prices contained in the standard contracts.³⁷

PGE's Application and the testimony of Robert Macfarlane and Brett Sims submitted in support indicate that PGE also has 42 solar QF projects, that are 3 MW or smaller, under contract or seeking a contract.³⁸ PGE's Application and the testimony of Mr. Macfarlane and Mr. Sims further indicate that at least 13 developers have obtained or seek contracts from PGE for multiple QF solar projects sized to avoid the 10 MW threshold on standard prices.³⁹ These facts, support the conclusion that the Commission should lower the threshold for solar QFs to obtain standard prices from PGE to 3 MW for the same reasons that it did so for Idaho Power in UM 1725 and for PacifiCorp in UM 1734.

In addition, the Commission should grant PGE the same relief that was granted to Idaho Power in UM 1725 and to PacifiCorp in UM 1734 to prevent any further "geographic arbitrage" where solar QFs that might otherwise seek PURPA contracts from Idaho Power or PacifiCorp seek to wheel their output to PGE in order to obtain standard prices under PGE's higher standard price eligibility threshold of 10 MW. PGE has 104 solar QF projects with combined output of 824.5 MW that either have a PURPA contract or are seeking a PURPA contract.⁴⁰ Of these projects, 84% (51 QF solar projects representing combined capacity of 692.5 MW) are located off

³⁶ Docket No. UM 1725, Order No. 16-129 at 5-6 (Mar. 29, 2016).

³⁷ Docket No. UM 1734, Order No. 16-130 at 5 (Mar. 29, 2016).

³⁸ PGE/104, Sims – Macfarlane/9.

³⁹ PGE/104, Sims – Macfarlane/8.

⁴⁰ PGE/102.

PGE's system and will wheel power to PGE to obtain PGE's terms, including PGE's 10 MW threshold on standard prices.⁴¹ And 90% of solar QF projects currently seeking a contract from PGE are off-system projects.⁴² This is strong evidence that PGE is experiencing geographic arbitrage and that interim relief is required to address this effect.

For all of these reasons, the Commission should grant PGE interim relief by lowering to 3 MW the eligibility cap for solar QFs to obtain standard prices from PGE. This interim relief will not prejudice QF developers. Developers proposing a solar project that exceeds 3 MW, but does not exceed 10 MW, will still be able to obtain a standard contract and will be able to negotiate a project-specific avoided cost price.

D. The Commission Should Grant Interim Relief Requiring a Solar QF Project to Negotiate a Contract and Project-Specific Prices if Any Owner of the Project has Obtained or Requested Standard Prices for More than 10 MW of Solar QF Output

As a second form of interim relief, PGE asks the Commission to declare that a solar QF project is not eligible for a standard contract or standard prices if the project is larger than 100 kW and any owner of the project has obtained or requested standard prices from PGE for more than 10 MW of solar QF output. The purpose of this request is to prevent sophisticated developers who are proposing portfolios with dozens of megawatts of solar QF output from breaking their portfolios into 3 MW or smaller pieces and qualifying for standard prices. Such developers are perfectly capable of negotiating more accurate project-specific prices for the dozens of megawatts of QF generation that they seek to add to PGE's system. It is not fair to ask PGE's customers to bear the risk of inaccurate standard prices when hundreds of megawatts of solar development is proposed by a handful of developers who have the capacity to negotiate more-accurate, project-specific prices.⁴³

⁴¹ PGE/103, Sims – Macfarlane/8.

⁴² *Id.*

⁴³ *See*, Docket No. UM 1129, Order No. 05-584 at 16 (May 13, 2005) (discussing role played by eligibility cap for standard contracts in balancing goal of aiding small developers to overcome transaction costs and market barriers against goal of accurate avoided cost prices and setting 10 MW eligibility cap); Docket No. UM 1610, Order No. 14-058 at 7 (Feb. 23, 2014) (reiterating the need to balance aiding small QF developers and protecting accurate avoided cost prices and upholding 10 MW eligibility cap); Docket No. UM 1725, Order No. 16-129 at 5-6 (Mar. 29, 2016)

At present, PGE has six developers who propose multiple solar QF projects sized at 3 MW or less per project so that each developer would hold solar QF contracts with combined output of between 4.4 MW and 30.1 MW, with a combined output of 92.8 MW.⁴⁴ This demonstrates that if the Commission adopts only the first form of interim relief requested by PGE (lowering the standard price eligibility cap to 3 MW), solar QF developers can organize their larger-than 3 MW project proposals into multiple 3 MW or smaller project proposals in order to evade a 3 MW cap on standard prices.

Single developers seeking multiple solar QF contracts for between 4.4 MW and 30.1 MW of combined output are sophisticated developers of large-scale QF generation and have the experience, expertise and capacity to negotiate more accurate, project-specific prices. To prevent such developers from evading a 3 MW cap on standard prices for solar projects, the Commission should grant interim relief declaring that a solar QF project above 100 kW is not eligible for a standard contract or standard prices if any owner of the project has obtained or requested standard prices from PGE for more than 10 MW of aggregate solar QF output. PGE is proposing that a single developer who proposes multiple solar QF projects of 3 MW or less, should be required to negotiate a contract (and prices) once it has proposed aggregate solar QF capacity of 10 MW—just like the developer of a single QF project with capacity above 10 MW must negotiate a PURPA contract and prices under Schedule 202.

In order to implement this criterion, PGE should be authorized to look beyond the “corporate veil” to determine whether a series of proposed solar QF projects share a common owner, developer or promoter who has an ownership stake in or exercises control over the QF projects, either as a member of the limited liability company with which PGE enters into a contract or otherwise. PGE proposes that the same ownership or control standards would apply in

(finding an increased risk to accurate avoided cost prices caused by unprecedented growth in QF activity and evidence that smaller QFs can negotiate project-specific prices, the Commission established a 3 MW eligibility cap for solar QFs to obtain standard prices).

⁴⁴ PGE/104, Sims – Macfarlane/8.

this context as those that apply under the partial stipulation adopted by the Commission in Order No. 06-538.⁴⁵

This interim relief will not prejudice QF developers because they can still obtain standard contracts and standard prices for multiple small solar QF projects of 3 MW or smaller until the developer has proposed aggregate solar QF capacity of 10 MW. Beyond that point, the QF developer is not prejudiced because it can still negotiate contracts and prices for all solar QF projects that it seeks to develop beyond the 10 MW aggregate threshold.

E. In the Alternative, the Commission Should Grant Interim Relief Requiring Solar QF Projects Larger than 2 MW to Negotiate Project-Specific Avoided Cost Prices

If the Commission decides not to grant a 3 MW individual project eligibility cap and a 10 MW aggregate eligibility cap as interim relief, then PGE requests that the Commission issue an order temporarily lowering to 2 MW the standard price eligibility cap for all solar QF projects. This relief would be less effective than a 3 MW individual project cap and a 10 MW aggregate cap because a developer could propose six or more 2 MW projects and obtain standard prices and contracts for more than 10 MW worth of aggregate solar QF output. But a 2 MW eligibility cap would at least address the immediate problem faced by PGE—specifically that six developers are requesting multiple solar QF contracts for projects sized at or close to 2.2 MW with total combined output of 92.8 MW.⁴⁶

III. CONCLUSION

For the reasons stated above, PGE requests that the Commission issue an order temporarily providing interim relief: (1) requiring that solar QFs larger than 3 MW negotiate project-specific avoided cost prices; (2) requiring that solar QFs larger than 100 kW negotiate contracts and project-specific avoided cost prices if any owner of the solar QF project has

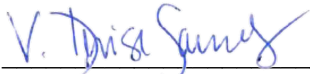
⁴⁵ See Docket No. UM 1129, Order No. 06-538 at 11 (Sep. 20, 2006) (approving and adopting partial stipulation); Docket No. UM 1129, Order No. 06-586 (Oct. 19, 2006) (clarifying Order No. 06-538 by providing the partial stipulation as an appendix that the Commission inadvertently failed to attach to Order No. 06-538); Docket No. UM 1610, Order No. 14-058 at 27 (Feb. 24, 2014) (limiting passive investor exemption to independent family owned or community-based projects)

⁴⁶ PGE/104, Sims – Macfarlane/8.

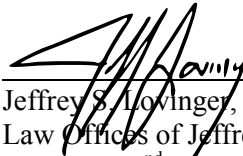
obtained or applied for standard prices from PGE for more than 10 MW worth of solar QF capacity. In the alternative, PGE respectfully requests that the Commission provide interim relief by lowering to 2 MW the standard price eligibility cap for all solar QF projects. Interim relief is necessary to protect PGE's customers from substantial and irreparable harm pending resolution of PGE's Application for permanent relief. At the very least, the Commission should temporarily reduce the standard price eligibility cap for solar QFs to 3 MW to prevent geographic arbitrage by providing PGE with the same standard price eligibility cap as that applicable to Idaho Power and PacifiCorp.

Dated this 30th day of June 2017.

Respectfully submitted,



V. Denise Saunders, OSB #903769
Associate General Counsel
Portland General Electric Company
121 SW Salmon Street, 1WTC1301
Portland, Oregon 97204
(541) 752-9060 (phone)
(503) 464-2200 (fax)
denise.saunders@pgn.com



Jeffrey S. Lovinger, OSB #960147
Law Offices of Jeffrey S. Lovinger
2000 NE 42nd Avenue, Suite 131
Portland, OR 97213-1397
(503) 230-7120 (office)
(503) 709-9549 (cell)
jeff@lovingerlaw.com