

ELLEN F. ROSENBLUM
Attorney General



FREDERICK M. BOSS
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DEPARTMENT OF JUSTICE
GENERAL COUNSEL DIVISION

September 19, 2016

VIA ELECTRONIC MAIL ONLY

Attention: Filing Center
Public Utility Commission of Oregon
201 High Street, Suite 100
P.O. Box 1088
Salem, OR 97308-1088

Re: *In the Matter of OREGON PUBLIC UTILITY COMMISSION Investigation to Determine
the Resource Value of Solar*
OPUC Docket No.: UM 1716
DOJ File No.: 330030- GN0062-15

Filing Center:

On behalf of the Oregon Department of Energy, enclosed for electronic filing today with
the Commission is the OREGON DEPARTMENT OF ENERGY'S REPLY BRIEF in the above-
captioned docket.

Sincerely,

Debra Manyano
FOR Renee M. France
Senior Assistant Attorney General
Natural Resources Section

Enclosures
RMF:jrs/#7708730
c: Wendy Simons, ODOE

BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

UM 1716

In the Matter of)	
)	
PUBLIC UTILITY COMMISSION OF)	OREGON DEPARTMENT OF
OREGON,)	ENERGY'S REPLY BRIEF
)	
Investigation to Determine the)	
Resource Value of Solar)	

On August 26, 2016, the Oregon Department of Energy (ODOE or department) submitted a Pre-Hearing Brief to summarize the points made in its response and cross-response testimony, and to clarify the department's recommendation for further research into the opportunities for behind-the-meter solar photovoltaic installations to provide a variety of services that will improve security, resiliency and reliability of the grid. After reviewing the briefs submitted by the other intervening parties in the UM 1716 docket, the department has no additional comments at this time. Therefore, rather than reiterate the earlier comments, the department refers to and incorporates by reference its earlier brief in this proceeding.

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ODOE would like to express appreciation to the Commission, its staff and consultant, and the other intervening parties for their work in the first phase of this proceeding, and looks forward to constructive discussion in the next phase of the investigation.

DATED this Monday, September 19, 2016.

Respectfully submitted,

ELLEN ROSENBLUM
Attorney General

FOR Debra Maryano #114519
Renee France, #004472
Senior Assistant Attorney General
Of Attorneys for Oregon Department of Energy