



## RENEWABLE ENERGY COALITION

October 28, 2020

Via Email

Chair Megan Decker  
Commissioner Letha Tawney  
Commissioner Mark Thompson  
Oregon Public Utility Commission  
c/o Garrett Martin, Commission Policy Advisor  
201 High Street SE, Suite 100  
Salem, OR 97301-3398

RE: Report on Executive Order 20-04 Comments

Dear Commissioners:

The Renewable Energy Coalition (the “Coalition”) submits these comments responding to the Oregon Public Utility Commission’s (the “Commission’s”) request for input on the Commission’s draft work plans to manage agency actions and activities in response to the Governor’s Executive Order 20-04 on Climate Action (“EO 20-04”). The Coalition appreciates the progress that the Commission has made so far in implementing EO 20-04 and the specificity of the proposed actions in the draft work plans.

In particular, the Coalition appreciates that the Commission’s work plans are generally responsive to the Coalition’s earlier comments. The Coalition previously discussed how the Commission’s implementation of the Public Utility Regulatory Policies Act (“PURPA”) has untapped potential to significantly reduce greenhouse gas emissions, making PURPA implementation a logical focus for implementing EO 20-04. The Coalition feels there are many ways the Commission could improve its PURPA implementation, but it highlighted two specific actions items, which warrant further discussion here.

*First*, the Coalition continues to recommend that the Commission prioritize and protect existing clean energy resources by ensuring that existing QFs are fully compensated for the many values they provide, including capacity contributions. Fair compensation is essential to ensure existing QFs continue to operate. The Commission will consider this issue, and others, in the general capacity investigation (UM 2011) and/or the PURPA investigations (UM 2000 and UM 2038), but the Commission did not acknowledge this issue in the draft action plans. The Coalition assumes that was an oversight and recommends that it be corrected.

*Relatedly*, the Coalition is pleased to see that the Commission’s draft work plans include a proposal to incorporate the social cost of carbon (“SCC”) in utility avoided cost filings. This is a modest but meaningful change, and it will likely facilitate fair compensation for both existing and new QFs. Unfortunately, the draft work plans undermine this proposal by describing it as merely something the PUC “envision[s] eventually exploring, at some future point.” The Coalition encourages the Commission to think more boldly and set an aggressive timeline for implementation.

*Second*, the Coalition continues to recommend that the Commission prioritize removing monopolistic restrictions on the interconnection process that hinder the development of non-utility owned clean energy, including but not limited to QFs. The Coalition is pleased to see that the Commission’s work plans recognize the importance of current dockets on interconnection reform, including for QF interconnections specifically (UM 2111 and UM 2032). The Commission’s general investigation into interconnection was launched more than four months ago, but lacks even a procedural schedule. However, the draft work plan indicates that stakeholders can look forward to reviewing an interconnection roadmap, with milestones, by early 2021. The Coalition looks forward to reviewing this roadmap and participating in the dockets generally.

*Finally*, the Coalition emphasizes its earlier recommendation that the Commission think and act broadly and boldly in implementing EO 20-04. While the draft work plans reflect some progress, the Coalition recognizes that actual emissions reductions are ultimately the only real indicator of success. The Coalition is hopeful that the draft work plans will produce measurable emissions reductions, but those results necessarily depend on the speed and adequacy of implementation. The Coalition encourages the Commission to move swiftly to avert catastrophic climate change.

Sincerely,

A handwritten signature in black ink, appearing to read "John R. Lowe". The signature is fluid and cursive, with a long horizontal stroke at the end.

John R. Lowe  
Executive Director  
Renewable Energy Coalition