

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

AR 631

In the Matter of Rulemaking to Address
Procedures, Terms, and Conditions
Associated with Qualifying Facilities (QF)
Standard Contracts

JOINT COMMENTS OF THE
COMMUNITY RENEWABLE ENERGY
ASSOCIATION, NORTHWEST &
INTERMOUNTAIN POWER
PRODUCERS COALITION, AND
RENEWABLE ENERGY COALITION
ON THE ADMINISTRATIVE LAW
JUDGE MEMORANDUM

I. COMMENTS

The Community Renewable Energy Association (“CREA”), the Northwest & Intermountain Power Producers Coalition (“NIPPC”), and the Renewable Energy Coalition (the “Coalition”) (collectively the “QF Trade Associations”) respectfully submit these Comments in response to the Administrative Law Judge’s (“ALJ’s”) December 3, 2021 Memorandum seeking comments on the grouping of issues and the initial schedule for Grouping 1. The Public Utility Commission of Oregon (the “Commission”) adopted Staff’s recommendation to move into formal rulemaking and use Staff’s Proposed Rules as a starting point for deliberations.¹ The ALJ Memorandum outlines the issues to be addressed in the formal rulemaking.

The QF Trade Associations appreciate Staff and the ALJ’s collaborative efforts to begin the formal rulemaking process and address the Proposed Rules in manageable groupings. Overall, the QF Trade Associations support the grouping of issues and the initial schedule. However, the QF Trade Associations seek clarification regarding rule recommendations from

¹ Order No. 21-353 at 1 (Oct. 26, 2021).

stakeholders that Staff did not implement in its Proposed Rules. The QF Trade Associations seek clarification that, at the time in which the Commission is reviewing the appropriate grouping of issues, stakeholders can bring up any rule recommendation during the proceedings even if the recommendation is not specifically included in Staff's Proposed Rules. This will ensure stakeholders' concerns will still be addressed, even if Staff did not include those rule changes in the Proposed Rules. Further, in the informal phase of the docket, Staff had a running list of additional issues that had not been addressed in workshops yet or that were simply flagged for future discussion. Some of these issues have not been addressed or Staff decided not to include them in the rules. Finally, in the final grouping of issues, the QF Trade Associations recommend that there be an opportunity to propose clean-up edits to the existing rules to eliminate inconsistencies and unintended consequences and to ensure that the cumulative effect of the rule changes is still consistent with the Public Utility Regulatory Policies Act.

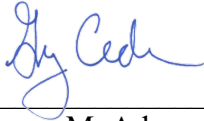
II. CONCLUSION

The QF Trade Associations appreciate the opportunity to seek clarification and look forward to continued participation in this rulemaking.

Dated this 10th day of December 2021.

Respectfully submitted,

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