



March 30, 2021

Oregon Public Utility Commission
Attention: Filing Center
201 High Street, Suite 100
Post Office Box 1088
Salem, OR 97308-1088

Re: AR 631 – OSSIA Comments on Staff Initial Proposal Related to PURPA Contracting Process and Terms

Dear Staff and Stakeholders:

The Oregon Solar + Storage Industries Association (OSSIA) respectfully submits these comments on Staff's initial proposal related to the Public Utility Regulatory Policies Act (PURPA) contracting process and terms dated January 15, 2021. OSSIA supports improvements to the PURPA contracting process and contract terms that fosters a robust PURPA market in Oregon. In particular, OSSIA supports:

1. Reasonable changes to the power purchase agreement (PPA) contracting process so long as changes do not result in unreasonable conflicts with the interconnection process;
2. Increasing to 25 or 30 year fixed-price PPA terms;
3. Requiring that a legally enforceable obligation be established when a QF submits a signed PPA;
4. Increasing the size of QF eligible for a standard PPA to 20 MW;
5. Removing the 5-mile rule for standard PPAs and published avoided cost prices;
6. Providing QFs with 3-5 years from the date of contract execution to reach commercial operations with reasonable extensions up to 7 years due to interconnection or transmission delays; and
7. Reasonable damages or penalties for utility actions to evade PURPA obligations.

Thank you for your consideration. We look forward to reviewing other proposals and additional topics as this rulemaking progresses.

Sincerely,

Angela Crowley-Koch
Executive Director