ORDER NO. 18 131

ENTERED APR 19 2018

BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

UM 1802

In the Matter of PUBLIC UTILITY COMMISSION OF OREGON, Investigation to Examine PacifiCorp, dba Pacific Power's Non-Standard Avoided Cost Pricing.	ORDER

DISPOSITION: PACIFICORP TO FILE REVISED AVOIDED COST SCHEDULES

I. INTRODUCTION

We opened this investigation in docket UM 1610, Order No. 16-429 to examine: (1) whether PacifiCorp, dba Pacific Power's non-standard avoided cost pricing should include a renewable price option; and if so; (2) how that renewable price option should be calculated? We find that PacifiCorp's non-standard avoided cost pricing should include a renewable price option that is calculated using the approach we designated in Order No. 11-505.

II. BACKGROUND AND PROCEDURAL HISTORY

In docket UM 1396, Order No. 11-505, we determined that PGE and PacifiCorp must present renewable qualifying facilities (QFs) with a renewable avoided cost pricing stream option. We identified two parameters: (1) The renewable avoided cost price stream would distinguish between periods of resource sufficiency and deficiency, with market prices paid in the former; and (2) the deferrable proxy resource under the renewable avoided cost price stream is the next avoidable renewable resource identified in a utility's acknowledged IRP. Our authority to adopt a separate renewable avoided cost stream for those utilities came from the requirement in ORS Chapter 469A "that electric utilities meet a renewable portfolio standard through the acquisition of renewable energy credits (RECs) associated with qualifying renewable generation resources[.]"[1]

[1] Order No. 11-505 at 4.

Following Order No. 11-505, PacifiCorp offered both standard and nonstandard renewable prices. PacifiCorp used the methodology adopted in docket UM 1129, Order No. 07-360 to calculate nonstandard renewable and nonrenewable prices. That approach provided for adjustment to standard contract avoided cost prices to account for seven FERC-identified QF factors enumerated at 18 C.F.R. § 292.30(e).

In UM 1610, Order No. 16-174, we authorized PacifiCorp to "use its Partial Displacement Differential Revenue Requirement (PDDRR) method to determine a starting point for non-standard cost price negotiations," and directed PacifiCorp to "open access to its production cost model (GRID) and provide training and technical assistance upon request."[2] We also ordered all three utilities to "set the floor for non-standard avoided cost prices at the wholesale power price forecast that is used to set sufficiency period avoided cost prices in standard QF contracts."

This matter arose from PacifiCorp's compliance filing to Order No. 16-174 that did not include a renewable avoided cost stream. Staff recommended that we find PacifiCorp's filing noncompliant, asserting that "nothing in Order 16-174 indicates that the Commission intended to rescind the requirement imposed under Order No. 11-505 that PacifiCorp give renewable QFs the choice between renewable and non-renewable avoided cost price streams. Following various filings and discussion at our November 8, 2016 Public Meeting, we opened this investigation "to examine whether PacifiCorp's non-standard avoided cost pricing should include a renewable price option, and if so, how that renewable price option should be calculated."[3]

PacifiCorp filed opening testimony on January 27, 2017. On May 5, 2017, the following parties filed reply testimony: Commission Staff; the Oregon Department of Energy (ODOE); the Renewable Energy Coalition (Coalition); Community Renewable Energy Association (CREA); and the Industrial Customers of Northwest Utilities (ICNU). The Coalition and CREA also filed joint reply testimony

Following various pleadings, PacifiCorp refiled opening testimony on July 21, 2017, that raised new issues while also being responsive to the preceding testimony filed in reply to the company's initial testimony. On August 14, 2017, Staff and ICNU filed response testimony and the Coalition and CREA filed joint response testimony. On August 22, 2017, PacifiCorp filed reply testimony while ICNU and Staff filed cross-answering/response testimony.

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[2] Order No. 16-174 at 2 (May 13, 2016).
[3] Order No. 16-429 (Nov 9, 2016).

No parties requested cross-examination on any issue and no hearing was held. Parties filed opening briefs on September 18, 2017, and response briefs on September 25, 2017.

III. DISCUSSION

A. Parties Positions

1. PacifiCorp

In its initial testimony, PacifiCorp resolved the first inquiry of this investigation. There, it acknowledged that the Commission had established separate renewable and nonrenewable pricing streams for standard QFs in Order No. 11-505, thereby making moot any dispute regarding whether PacifiCorp's non-standard avoided cost pricing should include a renewable price option. The primary focus of this investigation, therefore, centers on how that renewable price option should be calculated. This examination was made more complex by PacifiCorp's refiled testimony.

In its initial testimony, PacifiCorp presented a PDDRR-calculated renewable avoided cost price stream based on the deferral of a like renewable resource. In its refiled testimony, PacifiCorp presents a new framework for renewable avoided cost pricing that the company claims would: (1) provide a renewable QF with the same energy and capacity payments regardless of whether the QF cedes its RECs to PacifiCorp; and (2) add a payment if a QF turns over its RECs based on the avoided costs associated with the company's RPS compliance. This approach would result in prices reflecting the benefits associated with renewable resources used to meet RPS requirements, PacifiCorp argues, thereby being consistent with FERC guidance and Commission precedent that ties renewable avoided cost rates to RPS compliance costs.

Recognizing the broader implications of this new proposal, however, PacifiCorp recommends it be addressed in a separate policy docket. PacifiCorp asks that we approve its original proposal and adopt the PDDRR methodology with the company's recommended modifications to calculate the company's renewable, nonstandard avoided cost prices, but open a new generic investigation to address the larger issue of whether the framework for renewable avoided cost prices should be modified to better align with PURPA. PacifiCorp contends that the same reasons underlying our decision to approve use of the PDDRR methodology in Order No. 16-174 support the company's original proposal to use the methodology with minor tailoring to calculate renewable, nonstandard avoided cost prices. PacifiCorp relies on our statement, in that order, that the "GRID model-based method more accurately values energy and capacity on PacifiCorp's system by taking into account the unique characteristics (including location, delivery pattern, and

capacity contribution) of each QF."[4] We approved the PDDRR method, PacifiCorp notes, despite complaints that it was too complex, not transparent, and unnecessary.

PacifiCorp indicates that the primary methodological difference in using the PDDRR to calculate renewable versus nonrenewable avoided cost prices involves the assumption about what resource is deferred. When the PDDRR is used to calculate nonrenewable avoided cost prices, PacifiCorp assumes that a QF defers the next major thermal resource. For renewable avoided cost prices, however, PacifiCorp states it would assume that a QF defers the next renewable resource in the company's IRP preferred portfolio[5] *only if* the QF has the same operational characteristics as that resource, based on equivalent capacity contributions.[6] PacifiCorp argues it is appropriate to limit deferral to renewable resources of the same operational type because renewable resources have significant operational differences resulting in widely varying impacts on the company's system. PacifiCorp characterizes its proposal as "a more refined approach to the Commission's standard price calculation that adjusts the avoided-cost price based on the capacity contribution of different types of QFs"[7] because its proposal accounts for additional characteristics of a renewable QF. PacifiCorp argues that "[b]y assuming like-for-like resource deferral, PacifiCorp's proposal better ensures customer indifference."[8]

PacifiCorp contends that calculating renewable avoided costs by assuming that all renewable QFs are interchangeable is possible, but less accurate using any methodology including the PDDRR. PacifiCorp argues that it isn't the PDDRR methodology that is flawed, but rather "the notion that an avoided-cost price can produce customer indifference when resources with vastly different operational profiles are assumed to be interchangeable simply because the resources are both renewable."[9] PacifiCorp also asserts that the Commission is not required to treat all renewable QFs as interchangeable, pointing to FERC regulations stating that avoided cost prices may "differentiate among qualifying facilities using various technologies on the basis of the supply characteristics of the different technologies."[10] PacifiCorp disputes Staff's contention that we do not have a legal basis to calculate avoided costs based on like-for-like resource deferral, citing a FERC decision.[11] Staff relies on the holding that avoided cost rates must reflect "all sources able to sell to the utility," without grasping the limited context of that

[4] PacifiCorp Opening Brief at 7, citing Order No. 16-174 at 23 (Sep 18, 2017).
[5] PacifiCorp indicates that the PDDRR methodology approved by the Commission relies on the most recent IRP to calculate avoided cost prices, even if the not yet acknowledged.
[6] PacifiCorp Opening Brief at 5, citing PAC/100, MacNeil/3-4.
[7] *Id.* at 4-5.
[8] PacifiCorp Response Brief at 2 (Sep 25, 2017).
[9] *Id.* at 3.
[10] *Id.* at 4, citing 18 C.F.R. § 292.304(c)(3)(ii).
[11] *So. Cal. Ed. Co.*, 70 FERC ¶ 61,215, *reh'g denied*, 71 FERC ¶ 61,269, 62,078 (1995)).

holding, PacifiCorp states. FERC found, PacifiCorp explains, that avoided cost rates in California did not reflect all sources as they were exclusively based on a bidding process limited to only QFs.[12] PacifiCorp corrects the perception that "most renewable resources will generally not qualify for a renewable rate"[13] from PacifiCorp under its proposal. PacifiCorp indicates that wind, solar, geothermal, biomass, biogas, and hydro QFs would all be eligible for renewable avoided cost prices under its proposal.

PacifiCorp contends that the PDDRR methodology accounts for the aggregate impact of *all* QFs on the company's system to meet FERC regulations.[14] To improve the accuracy of non-standard avoided cost prices, a QF is added to PacifiCorp's QF queue at the time a QF requests an indicative price, PacifiCorp indicates. This approach accounts, PacifiCorp asserts, for all potential QFs located anywhere on the company's system to accurately value QF energy and capacity based on an up-to-date representation of the system and resource costs. PacifiCorp modified the methodology to provide a QF with the opportunity to move to the front of the queue and receive a higher avoided cost price by signing an execution-ready contract. PacifiCorp argues that this approach allows a QF to obtain price certainty and a higher rate while demonstrating ability and intent to move forward with the project. The recommendation by Staff and other parties, that the queue include only QFs with executed contracts is inappropriate, PacifiCorp asserts, because it shifts too much risk to customers because avoided costs under the PDDRR methodology decline as additional QF resources are added.

PacifiCorp challenges the appropriateness of a market price floor being applied to the PDDRR methodology, arguing it cannot be defended legally or factually. PacifiCorp asks that we remove the market price floor for three reasons: (1) our assumption that PacifiCorp can sell excess QF generation is contrary to federal and state law; (2) transmission constraints limit PacifiCorp's ability to sell excess QF generation; and (3) customers are not indifferent to avoided costs that are based on market prices.

2. Staff

Staff supports PacifiCorp's recommendation to open a separate docket to address PacifiCorp's new proposal. Staff contends that this docket is not the appropriate venue to address potential changes to policies established in Order No. 11-505. Staff explains that issues related to whether a renewable resource is procured due to cost-effectiveness or RPS compliance, and what impact this decision should have on avoided cost prices, are

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[12] *Id.*
[13] PacifiCorp Response Brief at 6, citing Renewable Energy Coalition's Opening Brief at 6, 10.
[14] PacifiCorp Opening Brief at 24, citing 18 C.F.R. § 292.304(e)(2)(vi) (avoided costs must account for "the individual and aggregate value of energy and capacity from qualifying facilities on the electric utility's sytem").

beyond the scope of this docket. For this reason, Staff agrees with PacifiCorp's proposal to "[m]ove consideration of the policy issues associated with the PacifiCorp's updated RPS and non-RPS avoided cost price streams to a generic investigation proceeding, beginning with the workshops directed by the Commission at the conclusion of docket UM 1794."[15]

Staff also recommends that we require PacifiCorp to use the approach designated in Order No. 11-505, which it names the "Adjusted Standard Price Method" to calculate renewable, nonstandard avoided cost prices in the interim. Staff notes that PGE continues to use this methodology, and argues that, unlike PacifiCorp's modified PDDRR proposal, the Adjusted Standard Price Method is clear and transparent. Staff expresses concern that PacifiCorp's modified PDDRR proposal keeps shifting, with the result being that the parties do not seem fully aware of all the details and implications. Staff also questions the accuracy of the PDDRR method as applied to renewable, nonstandard prices. Staff indicates that the PDDRR method was expected to improve price accuracy by taking into account the differences in the operating characteristics of a QF and the proxy resource, but laments that this goal may only be achieved for renewable, nonstandard resources if there are no differences between the two.

Staff opposes PacifiCorp's proposal to limit the availability of renewable avoided cost prices to QFs matching the resource type of the next avoidable renewable resource in PacifiCorp's IRP. Staff argues that PacifiCorp's "like for like" limitation is inconsistent with FERC's guidance that the calculation of a utility's avoided costs must take alternate procurement sources of electricity into account.[16] Staff also challenges PacifiCorp's proposal to base indicative pricing on all QFs in any stage of contract negotiation as untenable and unfair due to artificial deflation of prices. Staff recommends that indicative pricing be based only on QFs with executed contracts.

Staff also argues that PacifiCorp's concerns about transmission constraints are too generalized to justify departure from the Commission's long-standing precedent that QFs receive compensation for avoided capacity during both deficiency and sufficiency periods. In docket UM 1129, Order No. 05-584, the Commission determined that QFs would be compensated for capacity during a utility's sufficiency and deficiency periods, albeit differently. Docket UM 1610, Order No. 16-337 relied on this decision, Staff observes, when the Commission expressly noted that one reason for imposing a market price floor during a sufficiency period is to ensure that QFs are compensated for

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[15] Staff/200, Andrus/2, quoting PAC/300, MacNeil/46.
[16] Staff Reply Brief at 5 (Sep 25, 2017), citing *California Public Utilities Commission*, 133 FERC 61,059, 61,266 (2010 WL 4144227).

capacity.[17] Staff observes that the Commission acknowledged that "transmission constraints could exist that prevent otherwise economic market sales of low cost energy," but had not been shown to actually exist in Oregon.[18] Staff acknowledges that we invited PacifiCorp to notify us if such conditions appeared, but concludes that PacifiCorp's concerns as raised the issue in this docket fail to persuade.

3. ICNU

ICNU asserts that there are still issues to be resolved before renewable, nonstandard avoided costs can be properly calculated; consequently, ICNU recommends we keep the current pricing stream in place for renewable fixed avoided costs, with a 2028 RPS deficiency period for a while longer. If a QF's output is not needed by a utility for RPS compliance, ICNU argues the QF should not receive avoided cost pricing that assumes RPS costs are avoided. If a QF's power only displaces cost-effective renewable resource acquisitions, as PacifiCorp represents happens, then the QF should not receive avoided cost pricing that assumes the avoidance of RPS costs, ICNU states. To identify an appropriate methodology to calculate renewable, nonstandard avoided cost rates that do not burden cost-of-service ratepayers with pricing exceeding PacifiCorp's actual avoided costs, the Commission must first determine when a renewable QF allows PacifiCorp to avoid costs associated with the *renewable* attributes of the QF. ICNU recognizes our conundrum, however; we need to calculate renewable nonstandard avoided cost pricing that "accurately reflects the presence of displaced 'needs'" but we haven't yet determined "the 'needs' that would be displaced by QFs."[19] ICNU attributes this dilemma to PacifiCorp's 2017 IRP "which, according to the Company, includes renewable resource acquisition plans that raise 'avoided cost implications where a utility is pursuing near-term capacity investments that are not driven by reliability, RPS, or load-service *needs*.'"[20] ICNU recommends we resolve this and related issues before adopting a new methodology to calculate renewable, nonstandard avoided cost rates.

ICNU supports eliminating the market floor for the calculation of avoided costs. As one of the principal objectives of the PDDRR methodology is to determine which resources will be displaced by a QF under a system of least cost dispatch, ICNU observes that providing a floor in avoided cost prices based on market prices defeats the purpose of using the PDDRR methodology.

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[17] *Id.* at 6, citing Order No. 16-337 at 6
[18] Staff Opening Brief at 11 (Sep 18, 2017), citing Order No. Order No. 16-337 at 6.
[19] ICNU Opening Brief at 3 (Sep 18, 2017).
[20] *Id.* at 3, citing PAC/200, Lockey/5:1-3 (*emphasis added*).

4. The Coalition

The Coalition contends that we have already declared that all cost-effective renewable purchases are deferrable for the purposes of determining avoided cost rates, but if we want to revisit its PURPA's policies, we should do so in a generic proceeding. The Coalition also argues that PacifiCorp's proposal to eliminate the market price floor from the calculation of all non-standard avoided cost rates is outside the scope of this docket.

As to the merits of PacifiCorp's proposal to eliminate the market floor, the Coalition asserts that the company mischaracterizes federal and state law as being inconsistent with a market price floor for non-standard avoided cost prices. The Coalition contends that PacifiCorp's citations to third-party wheeling provisions in FERC Order 69 are not applicable, and that while citing language indicating that a QF cannot compel a utility to wheel its power to another utility to facilitate a PURPA sale, the company fails to acknowledge that the order does not impose a wheeling obligation on utilities. The Coalition also contests the applicability of PacifiCorp citations to other FERC language indicating that utilities are not obligated to pay for unneeded QF energy. The Coalition asserts that PacifiCorp cannot credibly make this argument since it is resource deficient, relying on market sales as it also plans major resource generation investments. The Coalition similarly argues that PacifiCorp's state law citations are inapplicable, because our decisions on the market floor for non-standard avoided cost rates do not require PacifiCorp to resell QF power. Rather, "[t]he language quoted by PacifCorp is merely illustrative of the Commission's ongoing struggle (since PURPA's inception) to accurately value capacity in the utility's avoided costs."[21] The Coalition also challenges the assertion by PacifiCorp that Staff concedes that transmission constraints limits PacifiCorp's ability to resell QF generation.

5. CREA

CREA urges the Commission to reject PacifiCorp's proposed PDDRR methodology and to direct PacifiCorp to return to using the method established in docket UM 1129, Order No. 07-360. CREA contends that PacifiCorp's proposal for calculating renewable avoided cost pricing demonstrates that it is "overly complicated, constantly changing, and fatally flawed."[22]

If we adopt the PDDRR methodology, CREA asks us to: (1) reject PacifiCorp's proposed like-for-like condition and require PacifiCorp to provide any renewable QF with avoided cost pricing that is based on deferral of the next renewable resource in the

[21] Renewable Energy Coalition Reply Brief at 7 (Sep 25, 2017).
[22] CREA Response Brief at 2 (Sep 25, 2017).

company's IRP with appropriate adjustments for capacity equivalence; (2) confirm that the PDDRR methodology will use PacifiCorp's most recent IRP, even if not yet approved; (3) confirm that the 2017 IRP's Wyoming Wind Resource is the deferrable renewable resource; (4) implement a QF pricing queue that relies on historical data about the likelihood that an executed QF contract will result in an operational facility; (5) require PacifiCorp to provide QFs with access to avoided cost pricing information at the outset of the process; and (6) retain the market price floor.

6. Renewable NW

Renewable NW recommends that we direct PacifiCorp to revert to its prior methodology for calculating nonstandard renewable avoided cost rates. Renewable NW contends that PacifiCorp's proposed approach is not consistent with Order No. 11-505, and is too complex and opaque. Should we allow PacifiCorp to use its proposed PDDRR methodology, Renewable NW supports the positions of Staff, REC, and CREA.

Renewable NW is concerned that PacifiCorp's proposal to include its entire QF queue when calculating indicative pricing for nonstandard QFs would result in rates that would likely underestimate avoided cost rates because it is highly unlikely that the entire queue will execute PPAs. Renewable NW recommends that only QFs with executed PPAs be included.

Renewable NW agrees with Staff and others that PacifiCorp inappropriately seeks to relitigate an issue that was recently decided and affirmed by the Commission. Renewable NW supports Staff's position that the issue of whether the market price floor should be eliminated for a particular QF is a factual inquiry that should be decided on a case-by-case basis.

7. ODOE

Focusing on PacifiCorp's arguments relating to the effect of transmission constraints, ODOE acknowledges that the company may face challenges with regard to delivering all QF power within existing transmission arrangements but asserts that PacifiCorp conflates transmission congestion with the load pocket issue. ODOE contends there is no reason to address how transmission congestion effects on a market price floor outside of the load pocket issue and that issue is being separately addressed. If a QF is not in a load pocket, the company does not need to deliver the QF's power to market, ODOE states. Instead, the QF's power reduced load and thermal generation power is available for delivery to market. ODOE further posits that since the Mid-Columbia market (Mid-C) is between

PacifiCorp's generation and loads, the company should always be able to deliver power to the Mid-C.

B. Commission Resolution

At the outset, we first acknowledge a limitation to our prior decision in Order No. 16-174 when we approved PacifiCorp's request to use its PDDRR methodology. Understanding from PacifiCorp that the PDDRR methodology adopted in Order No. 16-174 cannot be used to calculate renewable, nonstandard avoided cost rates without modification, we conclude that our prior decision in Order No. 16-174 relating to the use of PDDRR did not apply to renewable, nonstandard rates.

As PacifiCorp agrees that a renewable avoided cost price stream should be available to nonstandard QFs, the question we must resolve is what methodology PacifiCorp should use to calculate renewable, nonstandard avoided cost rates. To fully adapt the PDDRR methodology to the calculation of renewable, nonstandard avoided costs, PacifiCorp proposes to entirely revise the framework for such rates, but in a separate proceeding. PacifiCorp explains that it would like to provide a renewable QF with the same energy and capacity payments regardless of whether the QF cedes its RECs to PacifiCorp, but add a payment if a QF does turn over its RECs; this payment would be based on avoided costs directly associated with the company's RPS compliance. Recognizing that changing the renewable avoided cost rate framework is a significant policy issue, however, PacifiCorp suggests that we address it at a later time. Staff and all other parties agree that PacifiCorp's request to overhaul renewable, nonstandard rates should be addressed at a later time.

We share the parties' assessment of the complexity of fully adapting the PDDRR methodology for this purpose, and decline to address in this proceeding PacifiCorp's request to fully overhaul the methodology to calculate renewable, nonstandard rates. We recognize it may be appropriate to reevaluate the framework for renewable avoided cost rates in a larger policy docket. In so doing, we acknowledge that our decision here is likely to be an interim decision until we more fully address the future rate framework for renewable avoided costs.

We are presented with two options for the interim. PacifiCorp recommends that we authorize the company to use the PDDRR methodology with limited modifications to calculate renewable, nonstandard avoided cost rates. Staff and the other parties recommend that we direct PacifiCorp to continue using the methodology already approved in Order No. 11-505. In the alternate, Staff and the other parties propose

alternate modifications to the PDDRR methodology as applied to renewable, nonstandard avoided cost rates.

To evaluate whether to authorize PacifiCorp to use the existing Adjusted Standard Rate method or a modified PDDRR method, we apply the same standard we applied in Order No. 16-174. There, we acknowledged the complexity of the PDDRR methodology and recognized concerns about transparency, but adopted it for PacifiCorp's use being convinced of methodological improvements over the Adjusted Standard Price Method with regard to the valuation of QF energy and capacity. In order to approve PacifiCorp's modified PDDRR on a temporary basis, we will need to be convinced that the method's benefits during the interim period would outweigh any concerns about its use.

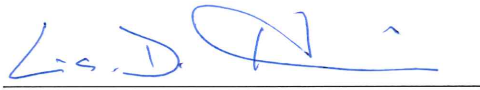
The objections to PacifiCorp's request to calculate renewable, nonstandard avoided cost rates here using a modified PDDRR are much greater in number and significance, however. Concerns about transparency continue, while the evolving nature of PacifiCorp's proposals add to worry about complexity. The proposed PDDRR modifications raise new worries too, about possible limitations on the availability of a renewable avoided cost rate stream for all types of renewable QFs, and inappropriate price dilution by including in the queue all QF contract requests instead of all executed QF contracts. These concerns are not countered by specific benefits of the modified method's use in the interim period, but only by PacifiCorp's contention that the same reasons supporting our adoption of the PDDRR in Order No. 16-174 support its authorization here, even though the company also acknowledges that further modification is necessary to make the PDDRR methodology function best for calculating renewable, nonstandard avoided cost rates.

Given the potentially temporary nature of our decision here, we found ourselves not convinced that it is appropriate to authorize a new methodology that even PacifiCorp acknowledges is imperfect. We direct PacifiCorp to continue using the Adjusted Standard Price Method to calculate renewable, nonstandard avoided cost rates. By not adopting PacifiCorp's modified PDDRR methodology, we resolve almost all of the remaining issues as they concerned alternate recommendations to adjust the PDDRR methodology should we authorize PacifiCorp to use it to calculate renewable, nonstandard avoided cost rates. To the extent that PacifiCorp requested that we remove the market price floor for the PDDRR in any application, we find that issue was not fully vetted and decide not to take it up in this proceeding.

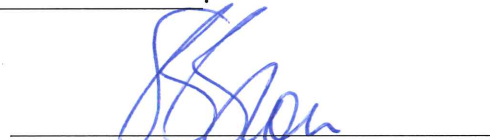
IV. ORDER

IT IS ORDERED that within 30 days of the date of this order, PacifiCorp will file revised avoided cost schedules that implement the resolutions made in this order.

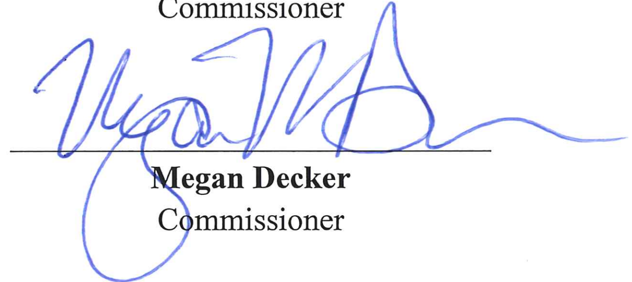
Made, entered, and effective APR 19 2018.



Lisa D. Hardie
Chair



Stephen M. Bloom
Commissioner



Megan Decker
Commissioner

A party may request rehearing or reconsideration of this order under ORS 756.561. A request for rehearing or reconsideration must be filed with the Commission within 60 days of the date of service of this order. The request must comply with the requirements in OAR 860-001-0720. A copy of the request must also be served on each party to the proceedings as provided in OAR 860-001-0180(2). A party may appeal this order by filing a petition for review with the Court of Appeals in compliance with ORS 183.480 through 183.484.