

April 26, 2019

VIA ELECTRONIC FILING

Public Utility Commission of Oregon
201 High Street SE, Suite 100
Salem, OR 97301-3398

Attn: Filing Center

Re: Docket No. UM 2000—Additional Comments

PacifiCorp d/b/a Pacific Power appreciates this opportunity to provide supplemental comments in Docket No. UM 2000, the Public Utility Commission of Oregon’s (Commission) Investigation into PURPA Implementation. As discussed at the April 5, 2019 workshop held by Commission Staff there may be areas of investigation that can be “fast-tracked” because they are either less complex or there is greater consensus among stakeholders. PacifiCorp has identified the following topics (raised by Commission Staff in their March 14, 2019 questions) as appropriate for a “fast-track” process:

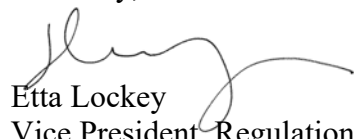
- Amendments to the dispute resolution process; and
- Determinations that a legally enforceable obligation under PURPA has been created, and the provision of data by utilities (subject to confidentiality concerns as discussed in related Docket No. UM 2001).

While there may not currently be consensus on these topics, based on the stakeholder discussion at the April 5th workshop, it seems likely that these issues can be resolved more quickly than certain larger issues.¹ For these more complex issues (*e.g.*, the appropriate methodology for determining avoided cost pricing, standardization of contracts, etc.), the Company supports continuing collaboration between stakeholders, and recommends that the procedural schedule ultimately allow for testimony to ensure that any changes are supported by a complete evidentiary record.

PacifiCorp appreciates the opportunity to provide this additional feedback to the Commission and looks forward to continued engagement with Commission Staff and other stakeholders.

Please contact Cathie Allen at (503) 813-5934 if you have any questions.

Sincerely,



Etta Lockey
Vice President, Regulation
Pacific Power & Light Company

¹ To the extent testimony is necessary, a fast-track process could rely on three rounds of testimony rather than five rounds.