

# Sanger Law PC

4031 SE Hawthorne Blvd., Portland, OR 97214

tel (503) 756-7533 fax (503) 334-2235 irion@sanger-law.com

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June 21, 2021

## Via Email

Adam Lowney  
Lisa Rackner  
McDowell Rackner Gibson  
419 SW 11th Ave., Suite 400  
Portland, OR 97205

Carla Scarsella  
Cynthia Mifsud  
PacifiCorp  
825 Multnomah St.  
Portland, OR 97232

David White  
Portland General Electric Company  
121 SW Salmon St., 1WTC1301  
Portland, OR 97204

Donovan Walker  
Idaho Power Company  
PO Box 70  
Boise, ID 83707-0070

Re: Joint Utilities Comments  
AR 631

Dear Joint Utilities Representatives:

I am sending this letter on behalf of the Northwest & Intermountain Power Producers Coalition (“NIPPC”) and Renewable Energy Coalition (“REC”) regarding the PacifiCorp, Portland General Electric Company and Idaho Power Company’s (“Joint Utilities”) comments in AR 631 characterizing NIPPC and REC’s position on PacifiCorp’s Washington power purchase agreement (“PPA”). NIPPC and REC did not oppose or support PacifiCorp’s Washington PPA for use in Washington, and NIPPC and REC oppose the use of PacifiCorp’s Washington PPA in Oregon. NIPPC and REC request that the Joint Utilities correct their statements regarding NIPPC and REC’s position made in their June 9, 2021 comments, including to recharacterize its reference to the PPA from “PAC/NIPPC/REC PPA” to remove “NIPPC/REC” from the reference.


NIPPC and REC have communicated their position on the PacifiCorp Washington PPA to PacifiCorp as part of confidential settlement discussions in Washington, and in both public written and oral comments in AR 631, and will not repeat them here. NIPPC and REC hope that the Joint Utilities now clearly understand NIPPC and REC's positions, and the Joint Utilities written and oral communications will more accurately describe these positions.

NIPPC and REC would like the Joint Utilities to understand that any inaccurate characterization of NIPPC and REC's position on the Washington PPA will impact their consideration of both settlement discussions and settlements with the Joint Utilities in the future. It will make it more difficult for NIPPC and REC to agree or not oppose the Joint Utility filings in specific cases if they need to be concerned that their decision will be mischaracterized in any of the Joint Utilities' filings in other states or proceedings. This is a particular concern for NIPPC and REC that advocate in different states with unique regulatory environments and that have diverse membership varying in size, technology and location.

Finally, the Joint Utilities' mischaracterization of NIPPC and REC's position is an unnecessary distraction from the important substantive issues in AR 631, and NIPPC and REC hope that the Joint Utilities will correct the record and more accurately characterize NIPPC and REC's position in the future.

Please do not hesitate to contact me with any questions.

Sincerely,



Irion A. Sanger

cc: Spencer Gray  
John Lowe  
Stephanie Andrus  
Greg Adams