

July 10, 2018

Via Electronic Filing

Commission Chair Megan Decker
Commissioner Steve Bloom
Commissioner Letha Tawney
Public Utility Commission of Oregon
201 High Street SE, Suite 100
Salem, Oregon 97301-3398

RE: Rulemaking Regarding Power Purchases by Public Utilities from Small
Qualifying Facilities
Docket No. AR 593

Dear Commissioners:

The Renewable Energy Coalition (“Coalition”) files these comments pursuant to the Public Utility Commission of Oregon (the “Commission”) Administrative Law Judge (“ALJ”) June 19, 2018 Memorandum issued in the above-referenced docket. The Coalition has reviewed the draft rules proposed by Commission staff (“Staff”) and believes they generally do a good job establishing a baseline scope to move forward with the formal rulemaking. We appreciate Staff’s willingness to discuss these rules in the informal workshop held on June 28, 2018 and make revisions to reflect those discussions. As is, the draft rules incorporate much of the relevant Commission orders, with a list of exceptions identified during the workshop where there was a lack of consensus about the Commission’s current practices.

While the current draft rules identify non-controversial areas of current status quo, the precise language of these rules still requires additional attention. The Coalition intends to address these kinds of changes once the formal rulemaking is initiated. More substantive changes will also be needed, however, to reflect the Commission’s current policies. The Coalition would also like to support the redlines provided by the Community Renewable Energy Association (“CREA”) as a thoughtful next step in this process.

Finally, the stakeholders identified several issues that are currently being litigated before the Commission and may therefore not be suitable for the current rulemaking process. Additional process guidance may be needed from the Commission with respect to scope. For example, it is unclear whether the Commission intends to provide regular or semi-regular updates to these rules or whether Commission orders under appeal should be codified at this time.

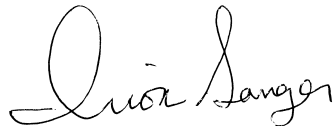
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The Coalition appreciates the opportunity to participate in this proceeding informally and looks forward to working with stakeholders during the formal rulemaking, once initiated.

Respectfully submitted,

A handwritten signature in black ink, reading "Irion Sanger". The signature is written in a cursive style with a large, looped initial "I".

Irion Sanger