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Subject: Re: OPUC Docket UM 2108 -- Notice of Filing Lacombe Irrigation District Comments for Item RA4 at 8/11/20 Public Meeting
Date: Friday, August 7, 2020 2:02:08 PM

On Fri, Aug 7, 2020 at 12:53 PM Jake Stephens <jstephens@newsunenergy.net> wrote:

LID's letter is consistent with, as documented by SEIA and others in the FERC proceeding, the lack of notification provided by a Pacificorp to stakeholders associated with its key reform in the initial FERC filing.

As someone holding several queue positions, I can confirm that we never received any specific notification of the proposed reform for any prospective interconnection in study.

We agree with the other issues LID raises, including the consequentiality of the issues, and lack of sufficient time, flexibility, rights, and transparency afforded in the processes proposed by Pacificorp for affected current and future interconnection positions. Among many other concerns.

As noted before, the scale of consequences of the proposed queue reform and the potential and, per comments and evidence provided, extensive damage and harm likely more potential to the affected stakeholders, are fundamentally and grossly inconsistent with the time and process associated with reviewing these proposals and their impacts.

Somehow, this Commission is separately proposing and pursuing schedules that will last months and even years for other subcomponents of the interconnection process, yet is ramming this fundamental backbone of the entire interconnection universe for the Oregon market into a fast-tracked process that is completely inconsistent with the scale of the consequences, *despite the parties request for more time*.

It is important and critical for the commission to slow down and focus on getting these things right and fully understanding the consequences and impacts of each of the specific proposals and policies, individually and cumulatively, which has not yet occurred. It is negligent for the commission to approve such a consequential matter without due process and consideration and understanding of such impacts and addressing them all specifically. It is also inconsistent, given the impacts, with the state statute requirements around QF *encouragement*.

For clarity, I, likely the single-most expert active QF developer in Oregon, as well as other trade groups that expertly represent QFs, have expressed, and provided evidence, that QFs will be HARMED by Pacificorp's proposals. The study processes proposed and the punitive deposits and withdrawal penalties are among many factors and revised tariff features which will be dissuasive, discouraging, undermine investment, and otherwise hurt QF's that exist and are prospective from ever existing and/or continuing to exist.

"Harm" and "encourage" are antonyms.

Finally, the Commission neglecting to force Pacificorp to address the substantial evidence of major glaring deficiencies in its power flow study approach, per CREA study provided to FERC and Staff, is likely to perpetuate the fundamental harm and dysfunction underlying the entire study process. It is morally and legally wrong for the commission to condone and facilitate the annihilation of the investments of many competitive generation projects affecting the future of this market, and the environment in which investments have been, and will be, made without addressing this fundamental issue. Particularly when there is reason to believe that this issue has been the underlying and primary causal heart of the queue dysfunction which they are claiming to want to cure. You have the power to make that happen and avoid related harm. Pacificorp told FERC it is "always" willing to hold such stakeholder processes to address the specific issue. The Commission should require stakeholder process and fixes immediately as a fast track priority condition to be completed and implemented before the transition cluster study occurs, for which there is time, and for which the consequences of getting it wrong before the cluster study occurs and imposes permanent impacts on all of those affected parties are tremendous and irreversible, and related harm absent a fix incurable, and it must occur irrespective of schedule impacts.

For clarity, the related FERC decision is NOT unchallenged, and numerous substantive issues have been raised by the parties in that case as having not been appropriately addressed by FERC relative to the applicable statutory standards. The Commission should not treat the related issues as settled nor definitively addressed; quite the opposite.

The health of your entire energy market and competition and investment in Oregon hinge on this decision. Take the time to get it right.

Jake Stephens
NewSun Energy

On Fri, Aug 7, 2020, 10:32 AM DAVIS Diane <diane.davis@state.or.us> wrote:

Docket Name: PACIFICORP QUEUE REFORM PROPOSAL

Description: Lacombe Irrigation District (LID) comments for 8/11/20 Public Meeting filed by Julie McKinnon.

Use the link below to view this document:

<http://edocs.puc.state.or.us/efdocs/HAC/um2108hac103032.pdf>

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