Fair Oregon Utility Rates
For Small Business

Fair Oregon Utility Rates For Small Business
(FOUR)
P.O. Box 2221
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November 13th, 2025

RE: FOUR Comments to Docket No. AR 641 / Post PUC Workshop (10.27.2025)

Fair Oregon Utility Rates for Small Business ("FOUR") appreciates the opportunity to provide comments following our participation in the October 27, 2025 Public Utility Commission ("PUC") Workshop regarding Docket No. AR 641 (Division 001 Rule Updates). Our constituency includes the small commercial rate payer class, which is the second numerous class of customers in the state of Oregon. Without FOUR bringing the small business voice to this rulemaking, it would be a missed opportunity in ensuring this customer class is represented in the amended Division 001 Procedural Rules process. FOUR looks forward to following and participating in this docket.

FOUR found the October 27, 2025 workshop as a helpful meeting to set the pace for this docket as well as providing a clear picture of the organization of each set of modules with their corresponding Oregon Administrative Rules (OAR) categories. FOUR also found the introduction slides of the history of the AR 641 docket as a great start to the workshop as it helped stakeholders understand the origins of the docket and what is the current status of the docket. Specifically, the mention of the recent state bill that was proposed by PUC stakeholders in addressing the procedural rules of the PUC is what caught FOUR's interest in this docket originally, as the organization had provided input on the mentioned proposed state legislation.

Reviewing Order 20-335 and reviewing the historical comments in this rulemaking, and recent comments from this past few weeks, FOUR offers these comments:

FOUR wonders whether, in considering other matters that may be included, there may be some development of rules regarding the statement of fiscal impact and in particular the cost of compliance on small business and (ORS 183.335(2)(b)(E)) required fiscal impact on small business so that it can be clearer how the OPUC implements that rule well and consistently to effectuate the statute's purpose.

Regarding the scoping question; "*How can we make these workshops more accessible to stakeholders?*" FOUR provides feedback that accessibility for the small business constituency to meeting times would take into account a workday schedule where the best time to meet would be a lunch break or rather than first in the morning or afternoon.

FOUR suggests that similar to considering the Attorney General Model Rules as discussed in the Workshop, in this revision process, perhaps the OPUC "Internal Operating Guidelines" where they may be appropriately applied, could be incorporated into Division 001 rules, rather than having to seek them out or even having to go find them. See OPUC Internal Operating Guidelines https://apps.puc.state.or.us/orders/2020ords/20-386.pdf.)

The timeline provided by the Administrative Law Judge (ALJ) John Mellgren, was explained clearly and FOUR understands the dates that are to follow and so the organization will keep an eye out as the docket develops with more information from December 2025 through early 2026 and on forth. Like other stakeholders comments received, FOUR agrees re taking into account the multitude of other proceedings including rulemakings in the PUC currently when determining order of deadlines and timing.

Again, the sets of modules and the types of OAR's that fall into each module will help stakeholders such as ourselves to understand which modules will be of particular interest to engage in as well as to prioritize throughout the rulemaking.

Sincerely,

/S/Guillermo Castillo Perez

Interim Board President
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