

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 1452

In the Matter of)	OREGONIANS FOR RENEWABLE
)	ENERGY POLICY'S RESPONSE IN
PUBLIC UTILITY COMMISSION)	OPPOSITION TO RENEWABLE
OF OREGON)	NORTHWEST PROJECT'S AND
)	CITIZENS' UTILITY BOARD'S MOTION
)	FOR ORDER ALLOWING SUPPLEMENTAL
Investigation into Pilot Programs to)	COMMENTS ON SOLAR COST DATA
Demonstrate the Use and)	
Effectiveness of Volumetric)	
Incentive Rates for Solar)	
Photovoltaic Energy Systems)	

Oregonians for Renewable Energy Policy (“OREP”) opposes the motion of RNP and CUB for an order allowing another round of opening and closing comments on the issue of solar cost data. RNP’s motion neglects to mention that the motion is opposed by OREP, Ecumenical Ministries of Oregon/Oregon Interfaith Power and Light, Solar Energy Solutions, Inc., Ray Neff and Sustainable Solutions Unlimited.

The parties submitted closing comments on February 12, 2010. OREP doubts the wisdom of reopening the record again after only thirty days, before the PUC has issued any order regarding the design of the pilot programs and before there has been any experience with the pilot programs.

The most accurate data available as of February 12 was presumably submitted in those comments. Prior to February 12, the parties participated in a workshop on volumetric incentive rates on January 20, 2010 and on January 22, 2010 were invited by the commissioners to submit information on the differences in the proposed volumetric incentive rates and the input assumptions for those rates.

The moving parties do not cite newly discovered evidence of cost data that was not available on February 12. Neither moving party submitted solar cost data in comments on February 12. There is no reason why they should be allowed to do so now. To allow the motion would reopen the record without a clearly stated basis for doing so, and would require more time and expense on the part of the parties which could have been avoided.

OREP’s position is that a precedent should not be set of reviewing cost data every thirty days. Review of the volumetric incentive rates is built into the proposed administrative rules. Periodic changes in solar cost data are assumed by the proposed rules. The proposed rate adjustment mechanism would adjust the volumetric incentive rates every six months. There is no irreparable harm alleged if the motion is denied.

The commission should proceed to issue an order based upon the record. Any needed adjustments to the volumetric rates should be made in accordance with the rate adjustment mechanism prescribed in the proposed rules.

For the foregoing reasons, the motion should be denied. If the motion is to be granted, the comments should not be limited to solar cost data in isolation, but should also address the rate adjustment mechanism and the interplay between the solar cost data and the rate adjustment mechanism.

DATED this 22nd day of March 2010.

OREGONIANS FOR RENEWABLE ENERGY POLICY

/s/ Mark E. Pengilly

CERTIFICATE OF SERVICE

I certify that I have caused to be served the foregoing OREGONIANS FOR RENEWABLE ENERGY POLICY'S RESPONSE IN OPPOSITION TO RENEWABLE NORTHWEST PROJECT'S AND CITIZENS' UTILITY BOARD'S MOTION FOR ORDER ALLOWING SUPPLEMENTAL COMMENTS ON SOLAR COST DATA, PUC Docket No. UM 1452, by electronic mail to the PUC Service list as of this date, and by US mail to the parties listed below who have not waived paper service.

Dated this 22nd day of March, 2010.

/s/ Mark E. Pengilly

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