



**Portland General Electric Company**  
*Legal Department*  
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**V. Denise Saunders**  
*Associate General Counsel*

March 30, 2017

***Via Electronic Filing***

Oregon Public Utility Commission  
Attention: Filing Center  
PO Box 1088  
Salem OR 97308-1088

**Re: UM 1610-** Investigation into Qualifying Facility Contract and Pricing

Dear Filing Center:

Enclosed for filing is Portland General Electric Company's ("PGE") Response in support of PacifiCorp's Motion to Close Docket.

Sincerely,

A handwritten signature in blue ink that reads "V. Denise Saunders". The signature is written in a cursive, flowing style.

V. Denise Saunders  
Associate General Counsel

VDS:bop

Enclosure

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON  
UM 1610**

In the Matter of

PUBLIC UTILITY COMMISSION OF  
OREGON,

Investigation into Qualifying Facility  
Contracting and Pricing.

**PORTLAND GENERAL ELECTRIC  
COMPANY'S RESPONSE TO  
MOTION TO CLOSE DOCKET**

In accordance with the March 1, 2017 Prehearing Conference Memorandum, Portland General Electric Company (PGE) submits this response to the Motion to Close Docket filed on March 15, 2017 by PacifiCorp d/b/a Pacific Power (PacifiCorp).

PGE supports PacifiCorp's motion to close docket UM 1610. PGE agrees with PacifiCorp that the docket has become focused on a PacifiCorp-specific inquiry, namely the allocation of third-party transmission costs for qualifying facilities seeking to interconnect in load pockets on PacifiCorp's system.<sup>1</sup> In its motion, PacifiCorp represents that the anticipated need for a proposal to address this issue has not materialized.<sup>2</sup> PacifiCorp also points out that it has dedicated a disproportionately significant amount of resources to this proceeding.<sup>3</sup> PGE agrees that in these circumstances it is appropriate to close the docket.

PGE also supports PacifiCorp's request that , if the Commission deems it appropriate to keep the docket open, that all parties be given the opportunity to submit legal briefing on the scope of the proceeding.<sup>4</sup> This is particularly important given the attempts of Renewable Energy

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<sup>1</sup> PacifiCorp Motion to Close Docket at 1, 10-11.

<sup>2</sup> *Id.* at 5-8.


<sup>3</sup> *Id.* at 8-9.

<sup>4</sup> *Id.* at 2, 12.

Coalition (REC) and Community Renewable Energy Association (CREA) to expand the scope of discovery beyond the issues initially anticipated by PGE and for the apparent purposes of proposing solutions that may be inconsistent with Federal Energy Regulatory Commission (FERC) Open Access Transmission Tariff (OATT) procedures and requirements and PURPA.<sup>5</sup>

DATED this 30th day of March, 2017.

Respectfully submitted,



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<sup>5</sup> See, *Id.* at 12.