

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 1725

In the Matter of)	
)	OBSIDIAN RENEWABLES, LLC'S
IDAHO POWER COMPANY,)	RESPONSE IN SUPPORT OF THE
)	MOTION FOR CLARIFICATION OF
Application to Lower Standard Contract)	THE COMMUNITY RENEWABLE
Eligibility Cap and to Reduce the Standard)	ENERGY ASSOCIATION AND THE
Contract Term, for Approval of Solar)	RENEWABLE ENERGY
Integration Charge, and for Change in)	COALITION
Resources Sufficiency Determination.)	

Obsidian Renewables, LLC (“Obsidian”) respectfully submits this response in support of the Motion for Clarification of the Community Renewable Energy Association (“CREA”) and the Renewable Energy Coalition (“REC”) that was filed in this docket on April 14, 2016.

Under the Commission’s PURPA policies, Qualifying Facilities (“QFs”) are entitled to a fixed revenue stream for a term of fifteen (15) years. CREA and REC note in their motion that the Commission’s long-standing policy is this 15-year period begins on the date that the QF achieves commercial operation (however such term is defined by each respective purchasing utility) and not on the contract execution date.

Obsidian agrees with CREA and REC that nothing in this docket purports to change that policy. In Order 16-129 the Commission reaffirmed its current policy, which “provides for 20-year contracts, with prices fixed at avoided cost rates in place at the time of signing remaining in effect for a 15 year period, and indexed pricing for the remaining five years * * *.” Obsidian understands the Commission’s words “in place at the time of signing” to mean only that the fixed avoided cost rate to be paid during the first 15-year period following commercial operation is the rate that existed at the time of signing. Obsidian does not

understand Commission's Order to mean that the 15-year period begins running at the time of signing. To the extent that there may be any ambiguity in the Commission's Order 16-129, then Obsidian supports the clarification sought by CREA and REC.

DATED this 19th day of April, 2016.

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