

From: [Mike McArthur](#)
To: [PUC PUC.FilingCenter * PUC](#)
Cc: [Les Perkins](#); [Ormand Hilderbrand](#)
Subject: UM 2225
Date: Thursday, October 6, 2022 1:02:40 PM

RE: UM 2225 HB 2021 Implementation - CEP Standards, Resiliency,

Dear Commissioners,

The Community Renewable Energy Association (CREA) agrees with the concerns and issues in NewSun Energy LLC's letter dated October 6, 2022, as well as those raised in Representative Ken Helm's letter dated October 4, 2022.

CREA also agrees with the framing by OSSIA at the October 4th public meeting as to the timeline issues and challenges as per Jack Watson's verbal comments, and how that should inform development of a meaningful "continual progress" benchmark that has proportion, scale, and timing consistent with HB 2021's binding emissions compliance obligations. Given that by 2030 the lion's share of emissions reductions are to be achieved, 80%, the procurements and actions these next 1-3 years are pivotal to Oregon's fate.

CREA supports NewSun Energy's recommended actions and requests the Commission implement them at today's meeting.

There is an urgency and import to the actions by the Commission today, relative to the viability of achieving HB 2021's requirements and goals, given the timelines of the processes and procurements, and when Oregon will know, or even be able to measure, much less correct course. The first CEPs minimum criteria are pivotal to this.

We request the PUC use its full authority and responsibilities and facilitating successful achievement of HB 2021 emission reduction requirement and state policies, in particular Section 1-15, as well as the statute in Section 37 for Small Scale Renewables. The PUC should signal clearly the high standards expected and its intent to use its authority to help Oregon succeed in these effort.

Sincerely,
Mike McArthur
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