

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**UM 1912**

In the Matter of	)	
	)	
PORTLAND GENERAL ELECTRIC	)	OREGON DEPARTMENT OF ENERGY'S
	)	COMMENTS IN LIEU OF REPLY
Portland General Electric Resource	)	TESTIMONY
Value of Solar	)	
_____	)	

The Department has no additional comments to add at this time, but continues to follow the proceeding and reiterates its interest in working with other parties to continue to refine the resource value of solar (RVOS) calculations and values over time. In particular, ODOE looks forward to participating in future efforts to quantify the grid services element of the RVOS, including the contributions of smart inverters, energy storage systems and other advanced technologies.

DATED this 20<sup>th</sup> day of April, 2018.

Respectfully submitted,

ELLEN F. ROSENBLUM  
Attorney General

*/s/ Jesse D. Ratcliffe*

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Jesse D. Ratcliffe, OSB #043944  
Senior Assistant Attorney General  
Natural Resources Section