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March 8, 2022

Oregon Public Utility Commission
Attention: Filing Center
201 High Street, Suite 100
Salem, OR 97301-3398

Re: LC 77 CREA Statement in Support of NewSun and Sierra Club's Motion to Stay Proceedings

Dear Commissioners:

Community Renewable Energy Association (CREA) respectfully submits this statement in support of the Joint Motion to Stay Proceedings filed in this docket by NewSun Energy LLC and Sierra Club on March 3, 2022. CREA believes that the schedule for this proceeding should be adjusted in light of the circumstances described by the Parties.

CREA's members include counties, irrigation districts, councils of government, project developers, for-profit businesses and non-profit organizations, many with a keen interest in this proceeding in that it presumably will result in another significant RFP for renewable resource procurement in support of PacifiCorp's compliance with HB 2021's emission reduction requirements.

CREA agrees with the Joint Motion Parties that "PacifiCorp has effectively blocked a legitimate stakeholder, NewSun, from participation by stonewalling NewSun's access to confidential information."¹ CREA is concerned that the disagreements between PacifiCorp and both NewSun and Sierra Club related to accessing critical information necessary to understand, evaluate, and meaningfully respond to the IRP interferes with a functional IRP process. It is essential that the IRP process function in a timely and transparent manner that ensures that expert stakeholders, like NewSun and Sierra Club, can access critical information, especially as we progress toward the formidable emission reductions targets adopted for our state between now and 2030. This is not about one company or one organization in particular; it is about PacifiCorp's apparently deliberate obstruction of allowing industry experts to analyze and vet the data and methods used in the IRP. The Commission should clearly indicate that obfuscation and excessive delays are unacceptable going forward.

¹ NewSun Energy LLC and Sierra Club's Joint Motion to Stay Proceedings and Toll the Procedural Schedule, or in the Alternative, Amend the Procedural Schedule, p. 5.

We are acutely aware that acknowledgment decisions have significant impacts on our members by way of resource development decisions, transmission plans and other related actions. However, IRP processes are lengthy and technical, and the resource and time commitment required to fully participate in IRP proceedings is discouraging and should not be amplified by policies and behaviors that add burdens and costs, which further dissuades participation by the public and organizations like CREA. We will continue to support calls for transparency into the IRP and other proceedings such as the Clean Energy Plans under HB 2021.

CREA understands PacifiCorp's desire for IRP acknowledgment to occur prior to a Commission decision on its 2022 RFP. However, the inability of stakeholders to fully evaluate the data inputs and assumptions used to develop the preferred portfolio of resources is a very serious and fundamental problem. CREA notes that PacifiCorp opted to design its supporting data in the way that it did, and IRP participants should not be forced to suffer from an already condensed schedule because of that choice. Therefore, CREA respectfully supports the motion to stay the proceedings, to promote a transparent and functional process in this docket as well as future dockets, where stakeholders can meaningfully participate.

Thank you for considering these comments.

Sincerely,

Sig./Mike W. McArthur

Mike McArthur
Executive Director
Community Renewable Energy Association