



DEPARTMENT OF JUSTICE
GENERAL COUNSEL DIVISION

August 7, 2025

Re: Post 2028 REP Process

Dear Post-2028 REP Team:

I am submitting comments on behalf of the Public Utility Commission of Oregon (OPUC). The OPUC thanks you for the opportunity to comment on the timing of the upcoming proceedings regarding the post 2028 Residential Purchase and Sales Agreements (RPSA), Average System Cost Methodology (ASCM), and 7(b)(2) Legal Interpretation and Implementation Methodology. The OPUC prefers your proposed Option 1 with overlapping processes for the RPSA and ASCM.

Neither option is ideal for the OPUC, as it is faced with a significant amount of work to implement recently enacted legislation along with the many matters presented in the ordinary course of business. Accordingly, to the extent it is possible to extend the January 2027 target for wrapping up all three processes and allow additional time for each of the three processes in turn, the OPUC respectfully asks that you do so.

Sincerely,

/s/ Stephanie Andrus

Stephanie Andrus
Senior Assistant Attorney General
Business Activities Section
Of Attorneys for Oregon Public Utility
Commission

c. Nolan Moser, OPUC Executive Director